UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATE OF AMERICA *Ex. Rel.* RONALD KUFNER, M.D. SANJIT JAYAKAR Plaintiffs, **vs.** THE PAIN CENTER USA, PLLC, INTERVENTIONAL PAIN CENTER, PLLC, AND RAJENDRA BOTHRA, M.D. Defendants.	Civil Action No.17-11644 **FILED *IN CAMERA* AND UNDER SEAL** **FALSE CLAIMS ACT MEDICARE AND MEDICAID FRAUD** **JURY TRIAL DEMANDED**

PLAINTIFFS' COMPLAINT PURSUANT TO 31 U.S.C. 3729-3732

NOW COMES, Co-Relators RONALD KUFNER, M.D. and SANJIT JAYAKAR, by and through their attorneys, AKEEL & VALENTINE, PLC and bring this action filed by Co-Relators pursuant to the Qui Tam provisions of the False Claims Act to recover damages and penalties arising from the submission of false claims to the United States, the Federal Medicare Program, and to the State of Michigan Medicaid Programs. The claims amount to millions of dollars for payment of false billings, among other fraudulent acts.

PARTIES

1. Co-Relator Ronald Kufner, M.D. is a citizen of the United States of America and a resident of the State of Michigan, County of Oakland. Dr. Kufner

is a physician in active practice and is double-boarded in Anesthesiology and Pain Medicine by the American Society of Anesthesiology. Dr. Kufner was and is employed by Defendants, The Pain Center USA, PLLC ("TPC") and Interventional Pain Center, PLLC ("IPC"), in some capacity, and at all pertinent times herein.

2. Co-Relator Sanjit Jayakar is also a citizen of the United States of America and a resident of the State of Michigan, County of Oakland. Mr. Jayakar served as the Chief Operating Officer for Defendants where he maintained full oversight of all personnel, all departments, and all processes that occurred within Defendants' facilities. Co-Relator Sanjit Jayakar was employed by Defendants, in some capacity, in early 2015, and remained there until he was terminated on December 31, 2016.

3. Defendant TPC is a professional limited liability company with two offices, located at 27423 Van Dyke, Warren, MI 48093, and 22480 Kelly Road, Eastpointe, MI 48201. Defendant, TPC, is a medical practice that is owned, operated, and/or controlled by Defendant Bothra.

4. Defendant IPC is a professional limited liability company which is also located at 27423 Van Dyke, Warren, MI 48093. IPC is also a medical practice owned, operated, and/or controlled by Defendant Bothra.

5. Defendant Rajendra Bothra is a doctor, and a graduate from Rajasthan University in Bikaner, Rajasthan, India, and currently owns, controls, and operates both corporate Defendants, TPC and IPC.

6. Co-Relators are suing on their own behalf, and on behalf of, and in the name of, The United States of America, pursuant to 31 USC 3730(b) and the State of Michigan, pursuant to the *qui* tam provision of Michigan's Medicaid False Claim Act, MCL 400.610a(2).

7. Co-Relators have complied with notice provisions of both the Federal False Claims Act, 31 USC 3730(b)(2) and the Michigan Medicaid False Claims Act, MCL 400.610a(2) by providing the Attorney General of the United States for the Eastern District of Michigan, and the Michigan Attorney General, Health Care Fraud Division, simultaneous with the filing of this complaint, with a statement of material evidence and information related to this complaint, which support the existence of the false claims by Defendant. (**Exhibit A**)

JURISDICTION AND VENUE

8. This Court has jurisdiction in this matter under 31 USC 3732(a) and 28 USC 1331 and 1345.

9. Further, this court may retain Co-Relators' state claims, the Michigan Medicaid False Claim Act claim, pursuant to its discretion to exercise pendant jurisdiction over that claim. Pendant jurisdiction is proper in this case because Co-

Relators' federal FCA claim is sufficiently substantial to support federal question jurisdiction; the FCA and Michigan FCA claims derive from a common nucleus of operative facts; and the nature of the FCA and Michigan FCA claims are such that judicial economy would be achieved and Co-Relators would expect that they be tried in one proceeding.

10. Venue is proper in the United States District Court for the Eastern District of Michigan, Southern Division pursuant to 31 USC 3732(a) and 28 USC 1391(b)(c) because all claims were originated from Defendant's principal place of business located in Macomb County, State of Michigan.

11. Co-Relators have direct and independent knowledge within the meaning and definition of 31 U.S. C. 3730(e)(4)(B) derived through and from Co-Relators relationship with Defendants at one or more of their facilities, of the information on which the allegations set forth in this Complaint are based. Furthermore, Co-Relators are persons qualifying as the original source of information pursuant to MCL 400.610a(13)

12. None of the allegations set forth in this Complaint are based on a public disclosure of allegations or transactions in a criminal, civil or administrative hearing, in a Congressional, administrative or general accounting office report, hearing, audit, investigation or from the news media.

FACTS

MEDICARE AND MEDICAID PROGRAMS

13. The United States administers the Federal Medicare Program through its agency, The Department of Health and Human Services (DHHS), The Center for Medicare and Medicaid Services (CMS), which was previously known as the Health Care Finance Administration. CMS is authorized to enter into and administer contracts on behalf of DHHS and the United States.

14. Inherent in CMS's contracting authority is the responsibility for administering the Federal Medicare Program and Medicaid payments.

15. Claims relating to Medicare reimbursement are sent to and processed through the Center for Medicare and Medicaid Services (CMS).

16. DHHS, through CMS, provides health insurance to eligible aged and disabled Americans (Medicare beneficiaries) pursuant to the provisions of the Medicare Program, Title XVIII of the Social Security Act, 42 USC 1395, et. seq. The Medicare Program provides health care services and benefits to certain eligible groups such as persons over age sixty-five, disabled persons and qualifying homebound persons in need of medical and nursing care. The Medicare Program is administered under two distinct parts.

17. Medicare Part A, "Hospital Insurance for the Aged and Disabled", covers health care services furnished by hospitals, home health agencies, hospices,

and skilled nursing facilities. Medicare Part B, "Supplementary Medical Insurance for the Aged and Disabled", covers laboratory services, X-rays, physicians' services and other non-institutional services, such as medical supplies and durable medical equipment (DME), as well as some other services not reimbursed under Medicare Part A.

18. The State of Michigan administers a Medicaid program consistent with the federal rules and regulations and processes payments to approved healthcare providers, including Defendants.

19. In Michigan, under MCL 400.105, the state Department of Community Health has been authorized to establish a program of medical assistance for the medically indigent pursuant to Title XIX. In establishing this program, the term "professionally accepted standards" is defined as "those standards developed by peer review advisory committees and professionals and experts with whom the director is required to consult." *Id.* Under this section, "provider" means an "individual, sole proprietorship, partnership, association, corporation, institution, agency, or other legal entity, who has entered into an agreement of enrollment specified by the director pursuant to MCL 400.111b(1)(c)."

20. Each provider is required to meet certain conditions to participate in the Medicaid program. MCL 400.111b. That statute provides in part:

> (22) It is the obligation of a provider to assure that services, supplies, or equipment provided to, ordered, or prescribed on behalf of a medically indigent individual by that provider will meet professionally accepted standards for the medical necessity, appropriateness, and quality of health care."

21. By becoming a participating provider in Medicaid, enrolled providers agree to abide by the rules, regulations, policies and procedures governing claims for payment, and to keep and allow access to records and information as required by Medicaid. In order to receive Medicaid funds, enrolled providers are required to abide by all the provisions of the Social Security Act, the regulations promulgated under the Act, CMS standards, and all applicable policies and procedures issued by the State.

22. Among the rules and regulations which enrolled providers agree to follow are to: (1) bill only for covered services which are medically necessary; (2) neither bill for any services or items which were not performed or delivered in accordance with applicable policies nor submit false or inaccurate information relating to provider costs or services; (3) not engage in any act or omission that constitutes or results in over utilization of services; (4) be fully licensed and/or certified under the applicable state and federal laws to perform the services provided to recipients; (5) comply with state and federal statutes, policies and regulations applicable to the Medicare and Medicaid programs; and (6) not engage in any illegal activities related to the furnishing of services to recipients.

23. As detailed below, Defendants submitted claims both for specific services provided to individual beneficiaries and claims for general and administrative costs incurred in treating Medicare and Medicaid beneficiaries.

24. Defendants knew, or should have known that federal and state Medicare and Medicaid laws and regulations require all forms and requests for payments submitted to the respective governmental departments to be truthful, accurate, and complete. Furthermore, Defendants and their owners, officers and board of directors knew, or should have known that federal and state Medicare and Medicaid laws and regulations require that they promptly correct any errors or omission that come to their attention after being submitted to a government department.

25. Defendants knew, or should have known that federal and state Medicare and Medicaid laws and regulations require providers to assure that services, supplies, or equipment provided, ordered, or prescribed on behalf of a medically indigent individual by that provider will meet professionally accepted standards for the medical necessity, appropriateness, and quality of health care.

26. Defendants knew, or should have known that federal and state Medicare and Medicaid laws and regulations require a corporation providing medical services to be in compliance with State laws, including those requiring their corporation to be registered, and in fact operate, as a professional services

corporation, including the reasons and healthcare policies behind those requirements.

27. At all times relevant to this Complaint, the Medicare and Medicaid programs constituted a significant source of gross patient revenue for Defendants. Defendants provide many different services, some which are used to solicit government funds. The services provided by Defendants include, but are not limited to, 1) Interventional Pain Management, 2) Anesthesiology, 3) Physical Medicine and Rehab, 4) Psychology, 5) Psychiatry, 6) Physical Therapy, 7) Pharmacy, 8) Durable Medical Equipment, and 9) Home Care. Co-Relators have knowledge of Defendants fraudulently soliciting funds from the government for Interventional Pain Management, Anesthesiology, Physical Medicine and Rehab, Physical Therapy, and Durable Medical Equipment.

28. As described below, Defendants have engaged in a calculated scheme to defraud the United States Government and State of Michigan, by among other things, improperly billing Medicare and Medicaid for services; improperly billing Medicare and Medicaid for equipment and supplies; improperly billing Medicare and Medicaid under a certified doctor's name, even though the work was done by other doctors ineligible to bill for Medicare and Medicaid; improperly billing for procedures by claiming that such procedures were done in an Ambulatory Surgery Center (ASC) when in reality such procedures were done in an uncertified

operating room; improperly billing Medicare and/or Medicaid for unnecessary back braces, shoulder braces, and other equipment; improperly billing for services that do not meet acceptable standards; and other improper and illegal acts causing false claims to be submitted.

FALSE CLAIMS ACTS

29. The Federal False Claim Act provides, in pertinent part, as follows:

(a) Liability for certain acts. Any person who

(1) knowingly presents, or causes to be presented, to an officer or employee of the United States Government or a member of the Armed Forces of the United States a false or fraudulent claim for payment or approval;

(2) knowingly makes, uses, or causes to be made or used, a false record or statement to get a false or fraudulent claim paid or approved by the Government;

(3) conspires to defraud the Government by getting a false or fraudulent claim allowed or paid;

(4) has possession, custody, or control of property or money used, or to be used, by the Government and, intending to defraud the Government or willfully to conceal the property, delivers, or causes to be delivered, less property than the amount for which the person receives a certificate or receipt.

30. The Michigan Medicaid False Claim Act provides, in pertinent part, as follows:

Michigan Compiled Laws 400.603:

(1) A person shall not knowingly make or cause to be made a false statement or false representation of a material fact in an application for Medicaid benefits.
(2) A person shall not knowingly make or cause to be made a false statement or false representation of a material fact for use in determining rights to a Medicaid benefit.

(3) A person, who having knowledge of the occurrence of an event affecting his initial or continued right to receive a Medicaid benefit or the initial or continued right of any other person on whose behalf he has applied for or is receiving a benefit, shall not conceal or fail to disclose that event with intent to obtain a benefit to which the person or any other person is not entitled or in an amount greater than that to which the person or any other person is entitled.

FRAUDULENT BILLING FOR SERVICES

31. Co-Relators incorporate by reference each and every preceding paragraph as if each was set forth again at length here, sentence for sentence and word for word.

32. Defendants, TPC and IPC, are medical practices owned, controlled and/or operated by Defendant Rajendra Bothra. In order to bill for surgical procedures in the IPC, surgical procedures must be performed in a safe manner by qualified physicians who have been granted clinical privileges by the governing body of the ASC in accordance with approved policies and procedures of the ASC. Defendants currently employ at least six practicing doctors at the IPC. Of the practicing doctors, and at relative times herein, some of the doctors were/are ASC credentialed which allows them to receive Medicare and Medicaid funds from certain insurers capable of retroactively administering government Medicare and

Medicaid funds. These insurers include, Aetna (AE), Blue Cross Complete (BCC), Total Health Care (THC), and Meridian (ME). Several of the other doctors were/are not credentialed, at all relevant times herein, and therefore services performed by those doctors should not be used to solicit Medicare and Medicaid funds for services that they render.

33. Defendant Bothra is responsible for determining how to categorize the services done by the non-credentialed doctors, and Co-Relators have knowledge of Defendant Bothra intentionally and improperly categorizing those services so to fraudulently solicit Medicare and/or Medicaid funds from the government. As such, many of the actual medical treatment that have been performed by those non-credentialed doctors have been attributed and billed in the names of the credentialed doctors, although the latter did not perform the treatment. In other words, Defendants would simply bill for work performed under a credentialed doctor's name, even though such work was actually performed by a non-credentialed doctor. This, in effect, allowed Defendants to fraudulently solicit Medicare and Medicaid funds from the government. (**Exhibit B,** Pictures showing Defendants' fraudulent attributing of services done by an uncertified doctor, to that of a certified doctor).

34. For example, work done by a Dr. Lewis (a non-credentialed doctor), was repeatedly billed under Dr. Kufner's name (credentialed doctor and the Co-

Realtor). This was unbeknownst to Dr. Kufner. See examples of fraudulent billings below that Dr. Kufner discovered:

Document ID	Date	Doctor	Health Provider	Billed Under	Treatment 1
0001	12/10/16	LEWIS	THC	KUFNER	01992
0002	12/3/16	LEWIS	THC	KUFNER	01992
0003	12/3/16	LEWIS	THC	KUFNER	01992
0004	12/3/16	LEWIS	THC	KUFNER	01992
0005	12/3/16	LEWIS	THC	KUFNER	01992
0006	01/06/17	LEWIS	THC	KUFNER	01992
0007	01/06/17	LEWIS	THC	KUFNER	01992
0008	01/06/17	LEWIS	THC	KUFNER	01992
0009	01/06/17	LEWIS	THC	KUFNER	01992
0010	01/06/17	LEWIS	THC	KUFNER	01992
0011	01/06/17	LEWIS	THC	KUFNER	01992
0012	01/06/17	LEWIS	THC	KUFNER	01991
0013	01/06/17	LEWIS	THC	KUFNER	01992
0014	01/06/17	LEWIS	THC	KUFNER	01992
0015	01/06/17	LEWIS	THC	KUFNER	01992
0016	01/06/17	LEWIS	THC	KUFNER	01992
0017	01/06/17	LEWIS	THC	KUFNER	01992
0018	12/06/16	LEWIS	THC	EDU	01992
0019	11/02/16	LEWIS	THC	EDU	01991
0020	11/02/16	LEWIS	THC	EDU	LUMBAR EPIDERAL WITH FLURO
0021	02/08/17	LEWIS	THC	EDU	01992

0022	02/09/17	LEWIS	THC	EDU	01992
0023	12/06/16	LEWIS	THC	EDU	01992
0024	12/06/16	LEWIS	THC	EDU	01991
0025	12/06/16	LEWIS	THC	EDU	50
0026	11/03/16	LEWIS	THC	N/A	64493, 64494, 64495
0027	11/03/16	LEWIS	THC	N/A	01991
0028	11/29/16	LEWIS	THC	EDU	01992
0029	11/29/16	LEWIS	THC	EDU	01992
0030	11/26/16	LEWIS	THC	EDU	01992
0031	11/26/16	LEWIS	THC	EDU	01992
0032	11/26/16	LEWIS	THC	EDU	77003
0033	11/23/16	LEWIS	THC	EDU	27096
0034	11/23/16	LEWIS	THC	EDU	77003
0035	11/23/16	LEWIS	THC	EDU	27096 (X2)
0036	11/23/16	LEWIS	THC	N/A	77003
0037	11/23/16	LEWIS	THC	EDU	64493, 64494, 64495
0038	11/23/16	LEWIS	THC	EDU	62311
0039	11/23/16	LEWIS	THC	EDU	01992
0040	01/10/17	LEWIS	THC	EDU	01991
0041	01/10/17	LEWIS	THC	EDU	01991
0042	01/10/17	LEWIS	THC	EDU	01992
0043	12/20/16	LEWIS	THC	N/A	01992
0044	01/03/17	LEWIS	THC	EDU	01992
0045	12/20/16	LEWIS	THC	EDU	01991
0046	12/20/16	LEWIS	THC	EDU	01992
0047	12/13/16	LEWIS	THC	EDU	01992

0048	12/13/16	LEWIS	THC	EDU	01992
0049	12/8/16	LEWIS	THC	EDU	01991
0050	12/8/16	LEWIS	THC	EDU	01992
0051	12/8/16	LEWIS	THC	EDU	01991
0052	12/06/16	LEWIS	THC	EDU	01991
0053	12/13/16	LEWIS	THC	EDU	01992
0054	12/13/16	LEWIS	THC	EDU	01991
0055	12/13/16	LEWIS	THC	EDU	01992
0056	01/10/17	LEWIS	THC	EDU	01992
0057	11/22/16	LEWIS	THC	EDU	01991
0058	11/17/16	LEWIS	THC	EDU	01991
0059	11/17/16	LEWIS	THC	BOTHRA	77003
0060	11/16/16	LEWIS	THC	EDU	99213
0061	11/07/16	LEWIS	THC	EDU	99213
0062	11/09/16	LEWIS	THC	EDU	99213
0063	12/02/16	LEWIS	N/A	EDU	99213
0064	12/19/16	LEWIS	N/A	EDU	99213

35. Please see attached **Exhibit C** for approximately 1,700 examples of other suspected fraudulent billing practices. The Co-Relators believe that there may well be other instances of this behavior that has yet to been uncovered, and that the number of occurrences could be substantial.

II FRAUDULENT BILLING FOR DURABLE MEDICAL EQUIPTMENT

36. Co-Relators incorporate by reference each and every preceding paragraph as if each was set forth again at length here, sentence for sentence and word for word.

37. Defendants' regularly order Durable Medical Equipment (DME)

38. Co-Relators have knowledge that Defendants fraudulently bill and solicit money from the government for unnecessary DME. Such equipment includes back braces and shoulder braces. Each back brace costs the government approximately $1200 - $1800, while each shoulder brace costs the government approximately $800.

39. Co-Relators have knowledge of Defendants improperly billing for equipment such as shoulder and back braces, when such equipment is unnecessary. For example, Defendants have over 100 new patients per month. Of those, the majority are ordered back braces and/or shoulder braces. Even though the government pays for such equipment through Medicare and Medicaid, some

patients never actually receive those braces, or are not provided the proper equipment and/or services.

40. Many of the patients that do actually receive those braces fail to receive proper instruction as to the use of these devices, and some leave the clinic unaware of the purpose. Additionally, there is little or no documentation of the patient's continued use of the device or its effect on the patient's medical condition.

41. Co-Relators are aware of the pressures to provide DME, as evidenced by the magnitude of the prescribing practice and the notes left by Dr. Bothra instructing the other doctors to bill for back and shoulder braces.

III. FRAUDULENT BILLING UNDER THE AMBULATORY SURGICAL CENTER FOR PROVIDING SERVCES NOT MEETING PROPER STANDARDS

42. Co-Relators incorporate by reference each and every preceding paragraph as if each was set forth again at length here, sentence for sentence and word for word.

43. Ambulatory Surgical Centers (ASCs) are required to be in compliance with the Federal requirements set forth in the Medicare Conditions for Coverage (CFC) in order to receive Medicare/Medicaid payment.

44. Defendants currently have one operating room that is ASC certified. For operations conducted in these operating rooms by certified doctors, Defendants

are able to solicit the government for two types of fees: a facility fee (for operating in an ASC compliant room) and a professional fee (for an ASC certified doctor operating in an ASC compliant room).

45. Defendants' current and only ASC certified operating room did not come into existence until December 24, 2015, but it was not ASC certified by the CMS until February of 2017. Prior to receiving this ASC certification however, Defendants were billing the government for services done by ASC certified doctors in non-ASC operating rooms, as if those services were being done by those doctors in facilities that were ASC certified. Defendants would simply bill the government for a professional fee, knowing that CMS will not verify whether those services were rendered in an ASC certified operating room. Co-Relators have knowledge that Defendants did not become ASC certified by the CMS until February 18, 2017, yet throughout 2016 Defendants were fraudulently billing the government for services and representing that those services were done in an ASC operating room.

46. Furthermore, Defendants have stated an objective of having two functioning procedure rooms at full capacity, performing up to 50 cases per day in each room, five or more days a week.

47. Currently there are two rooms: a procedure room which is not ASC approved, and an operating room which is considered ASC approved. For

operations in the ASC approved room, a doctor can bill for approximately four times the amount than he would have been able to in a non-ASC approved room. However, to maintain status as an ASC approved operating room, there are more regulations that must be adhered to. Such regulations were developed by the Centers for Medicare & Medicaid Services (CMS). Also, the process from admission, to injection, to discharge is much simpler and faster in a non-ASC room as compared to an ASC approved one.

48. As observed by the Co-Relators, the policies and procedures set forth for certification as an ASC by CMS were observed and practiced to a large extent only when the clinic approached an inspection. In fact, as demonstrated in **Exhibit D,** on October 18, 2016 Defendants were subject to an unannounced inspection by The Joint Commission (which conducts compliance inspections for CMS) in order to determine whether Defendants' actions were in compliance with ASC regulations. The Joint Commission then issued a 44 page report finding Defendants not in compliance with ASC standards. Although Defendants were more prepared for their next inspection and ultimately received ASC certification, Co-Relators have personal knowledge of Defendants still continuing to violate many of the ASC regulations to this day.

49. Furthermore, Co-Relators have personal knowledge of certain CMS standards and procedures that are being disregarded by Defendants, which include

but are not limited to, procedures being performed in the non-ASC-approved operating room, yet Defendants still improperly bill the government for reimbursement by portraying that such services were actually performed in an ASC approved room.

50. Another example of procedures being performed by Defendants, while not meeting standards to qualify for billing the government, is seen in the handling and administering of dose vials. CMS requires that only single dose vials be used in the ASC operating room, and that they be used only on a single patient. Multiple dose vials are not to be used, unless such vials are used to fill a syringe with a single vial outside of the operating room, and then brought in (after being properly labelled). Defendants do not adhere to this regulation. Rather, single and multiple vials are commingled in the operating room, and both are used on multiple patients and stored overnight.

51. Co-Relators also have knowledge of procedures being done in the non-ASC operating room, but being billed as if such those procedures were actually done in the ASC operating room.

52. Co-Relators also have knowledge of other violations of CMS regulations including, but not limited to, 1) failing to properly train and educate staff members and ensure that such members are properly licensed and/or certified to be performing the work that is being administered, 2) failing to properly

examine and maintain the equipment within the facilities so to ensure that such equipment is in good working order, and to determine whether certain environmental and sanitary requirements have been met (see **Exhibit E** – Equipment Monitoring log, which was discovered on May 10, 2017 as fraudulently filled out for the entire month of May 2017), 3) failing to properly maintain and ensure that the Medical Gas and Oxygen Logs are completed properly as required by CMS for the ASC to exist, 4) failing to complete a comprehensive medical history and physical assessment within 30 days of the date of planned surgery (rather, such assessments have often been completed afterwards), 5) failing to conduct surgical procedures in compliance with the ASC standards set to avoid wrong site/wrong person/wrong procedure errors, 6) failing to secure patient care supplies (as required by CMS), including syringes, needles, and potentially injurious medications, 7) failing to secure access to the operative and recovery area of the facilities, thereby allowing patients unfettered access into the pre and post op areas, 8) failing to appropriately clean between surgical cases, 9) failing to train all surgical staff in the use of emergency equipment, 10) failing to have patients sign informed consent forms in the manner required by CMS, 11) failing to properly train or supervise staff members in compliance with the standards set by CMS for the ASC to exist, and 12) failing to have at least the required minimum nursing staff during, pre, post, and intra operating procedures. As demonstrated in **Exhibit**

D, many of these existing violations mirror that which existed in October 2016 when Defendants failed their first inspection.

COUNT I

Federal False Claims Act (31 USC 3729(a)(1)(A))

53. Co-Relators incorporate by reference each and every preceding paragraph as if each was set forth again at length here, sentence for sentence and word for word.

54. This is a claim for treble damages and penalties under the False Claims Act, 31 U.S.C. § 3729. *et seq.,* as amended.

55. Defendants knowingly and intentionally submitted, or caused to be presented, claims for payment for services where said claims contained falsity and misrepresentation.

57. By virtue of the acts described above, Defendants knowingly presented or caused to be presented, false or fraudulent claims to the United States Government for payment or approval.

58. The Government, unaware of the falsity of the records, statements and claims made or caused to be made by Defendants, paid and continues to pay claims that are fraudulently submitted.

59. By reason of the Defendants' acts, the United States has been damaged, and continues to be damaged, in a substantial amount to be determined at

trial. Federal health insurance programs have paid many claims that have been fraudulently submitted, which has amounted to millions of dollars illegally induced by Defendant.

60. As such, Defendants submitted false claims and violated the False Claims Acts of the United States and are liable for all damages, penalties, fines set forth in those acts, as well as all other applicable relief.

COUNT II

FEDERAL FALSE CLAIMS ACT (31 USC 3729(a)(1)(B)

61. Co-Relators incorporate by reference each and every preceding paragraph as if each was set forth again at length here, sentence for sentence and word for word.

62. Defendants knowingly and intentionally used or made, or caused to be used or made, false records or statements, i.e. the false certifications and representations, when they submitted claims for payment for that were not properly indicated or documented.

63. As such, Defendants submitted false claims and violated the False Claims Acts of the United States and are liable for all damages, penalties, fines set forth in those acts, as well as all other applicable relief.

COUNT III

FEDERAL FALSE CLAIMS ACT (31 USC 3729(a)(1)(G)

64. Co-Relators incorporate by reference each and every preceding paragraph as if each was set forth again at length here, sentence for sentence and word for word.

65. Defendants knowingly and intentionally used or made, or caused to be used or made, false records or statements, i.e. the false certifications and representations, when they submitted claims for payment for that were not properly indicated or documented.

66. As such, Defendants submitted false claims and violated the False Claims Acts of the United States and are liable for all damages, penalties, fines set forth in those acts, as well as all other applicable relief.

COUNT IV

Michigan Medicaid False Claims Act (MCL 400.610a(2))

67. Co-Relators incorporate by reference each and every preceding paragraph as if each was set forth again at length here, sentence for sentence and word for word.

68. The above actions, omissions, and allegations are all violations of the appropriate sections of the Michigan Medicaid False Claims Act.

69. As such, Defendants submitted false claims and violated the False Claims Acts of the United States and the State of Michigan, and is liable for all damages, penalties, fines set forth in those acts, as well as all other applicable relief.

PRAYER FOR RELIEF

WHEREFORE, Co-Relators Dr. Ronald Kufner, M.D. and Sanjit Jayakar, by and through their attorneys, on behalf of the United States of America and the State of Michigan, respectfully request judgment be entered in their favor against Defendant, including:

1) Treble the amount of the United States and the State of Michigan's damages;

2) Any and all additional compensation, penalties, damages and relief allowable under the *Qui Tam* provisions of the Federal False Claims Act, being 31 USC 3729 et. seq. and the Michigan Medicaid False Claims Act, being MCL 400.610a;

3) Costs, interest and attorney fees;

4) Other applicable legal and/or equitable relief that this court deems just and applicable.

Co-Relators respectfully request an applicable percentage of the total award as determined by this Honorable Court to be justified under the circumstances and taking into consideration, among other things, whether the United States or State of Michigan governments intervene in this action.

Respectfully submitted,

AKEEL & VALENTINE, PLC

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Dated: May 24, 2017

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATE OF AMERICA *Ex. Rel.* RONALD KUFNER, M.D. SANJIT JAYAKAR Plaintiffs, **vs.** THE PAIN CENTER USA, PLLC, INTERVENTIONAL PAIN CENTER, PLLC,) AND RAJENDRA BOTHRA, M.D. Defendants.	Civil Action No. **FILED *IN CAMERA* AND UNDER SEAL** **FALSE CLAIMS ACT** **MEDICARE AND MEDICAID FRAUD** **JURY TRIAL DEMANDED**

JURY DEMAND

NOW COMES Co-Relators, RONALD KUFNER, M.D. and SANJIT JAYAKAR, by and through their attorneys, Akeel & Valentine, PLC, and hereby demands a trial by Jury of the above-captioned cause of action.

Respectfully submitted,

AKEEL & VALENTINE, PLC

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Dated: May 24, 2017

EXHIBIT A

**MEMORANDUM PURSUANT TO 31 U.S.C. §§ 3730(e)(4)(B) and 3730(b)(2)
AND PURSUANT TO MCL 400.610(a)(2)
DISCLOSING MATERIAL EVIDENCE SUPPORTING
FALSE CLAIMS ACT COMPLAINT AGAINST
THE PAIN CENTER USA, PLLC, INTERVENTIONAL PAIN CLINIC, PLLC, AND
RAJENDRA BATHRA, M.D.
BY CO-RELATORS
CONFIDENTIAL AND PRIVILEGED**

This document is subject to the attorney-client privilege and the attorney work product doctrine and was prepared by attorneys for the Relators in anticipation of litigation. Submission of this document to the United States Government is not and shall not be construed to be a waiver of any privilege or a waiver of any exemption from discovery of this document that otherwise applies.

INTRODUCTION

This document is voluntarily provided to the government pursuant to an action under the False Claims Act, § 31 U.S.C. §§ 3729 *et seq* and MCL 400.610(a)(2). Submission of this memorandum does not constitute an admission that any of the information upon which Relators' claim is based was publicly disclosed. The anticipated suit involves violations of the Federal and State False Claims Acts by THE PAIN CENTER USA, PLLC ("TPC"), INTERVENTIONAL PAIN CLINIC, PLLC ("IPC"), and RAJENDRA BOTHRA, M.D. ("Dr. Bothra").

The violations of the False Claims Act arise because Defendants knowingly, intentionally, and fraudulently presented false records or statements to the government of the United States in order to solicit large sums of money in Medicare and Medicaid funds. In essence, as will be discussed below, TPC, IPC, and Dr. Bothra engaged (and continue to engage) in a deliberate course of conduct designed to defraud the federal government of millions of dollars.

This case involves an egregious, and systematic, scheme involving false claims presented for payment, and false documents submitted in order to get claims paid. As more fully described below, these claims were submitted to the United States government by the Defendants and are related to their fraudulently solicited Medicare and Medicaid payments. Defendants profited from this abusive scheme by, among other things, 1) improperly billing Medicare and Medicaid for services; 2) improperly billing Medicare and Medicaid for equipment and supplies; 3) improperly billing Medicare and Medicaid under a certified doctor's name, even though the work was done by other doctors ineligible to bill for Medicare and Medicaid; 4) improperly billing for procedures by claiming that such procedures were done in an Ambulatory Surgery Center (ASC) when in reality such procedures were done in an uncertified operating room; 5) improperly billing Medicare and Medicaid for unnecessary back braces, shoulder braces, and other equipment, 6) improperly billing for services that do not meet acceptable standards, and 7) other improper and illegal acts causing false claims to be submitted.

Relators brings this action, individually, and on behalf of the United States of America against Defendants for actual damages, treble damages, and civil penalties arising from Defendants' false statements and false claims in violation of the Civil False Claims Act, 31 U.S.C. § 3729 *et seq*. Relators also bring this action on behalf of the State of Michigan for such damages pursuant to MCL 400.610(a)(2).

THE PARTIES

I. RELATORS:

Dr. Ronald Kufner is a citizen and a resident of the United States of America. He is the "original source" of this information within the meaning of 31 U.S.C. § 3730(e)(4)(B) and under applicable state laws, but states that to his knowledge the information contained herein concerning Defendants' alleged False Claim Act violations has not been publicly disclosed.

Dr. Kufner is a physician in active practice and is double-boarded in Anesthesiology and Pain Medicine by the American Society of Anesthesiology. He has been practicing for more than 25 years. At all relevant times herein, Dr. Kufner was and is employed by working for Defendants, TPC, IPC, and Dr. Bothra, in some capacity.

Sanjit JayaKar is also a citizen and a resident of the United States of America. He is also the "original source" of this information within the meaning of 31 U.S.C. § 3730(e)(4)(B) and under applicable state laws, but states that to his knowledge the information contained herein concerning Defendants' alleged False Claim Act violations has not been publicly disclosed.

Mr. Jayakar served as the Chief Operating Officer for Defendants where he maintained full oversight of all personnel, all departments, and all processes that occurred within Defendants' facilities. Co-Relator Sanjit JayaKar was employed by Defendants in early 2015, and remained there until he was terminated on December 31, 2016.

II. DEFENDANTS:

Defendant TPC is a professional limited liability company with two offices located at 27423 Van Dyke, Warren, MI 48093, and 22480 Kelly Road, Eastpointe, MI 48201. Defendant TPC is a medical practice that is owned, operated, and/or controlled by Defendant Bothra.

Defendant IPC is a professional limited liability company which is also located at 27423 Van Dyke, Warren, MI 48093. IPC is also a medical practice owned, operated, and/or controlled by Defendant Bothra.

Defendant Rajendra Bothra is a doctor, and a graduate from Rajasthan University in Bikaner, Rajasthan, India, and currently owns, controls, and operates both corporate Defendants, TPC and IPC.

III. DEFENDANTS' FRAUDULENT SCHEMES

a. Fraudulent Billing for Services:

The United States administers the Federal Medicare Program through its agency, The Department of Health and Human Services (DHHS), though The Center of Medicare and Medicaid (CMS). CMS is responsible for administering the Federal Medicare Program and Medicaid payments. Therefore, CMS (and the State of Michigan) have established regulations in which practicing physicians and medical practices must abide by in order to receive Medicare and Medicaid funds from the government. For several years now, Defendants have failed to abide by these regulations, yet fraudulently soliciting Medicare and Medicaid funds from the government by representing compliance with the required regulations.

For example, in order to bill for surgical procedures in the IPC, CMS requires that surgical procedures be performed in a safe manner by qualified physicians who have been granted clinical privileges by the governing body of the Ambulatory Surgical Center (ASC) in accordance with approved policies and procedures of the ASC.

Defendants currently employ at least six practicing doctors at the IPC. Of the practicing doctors, and at relative times herein, some of the doctors were/are ASC credentialed which allows them to receive Medicare and Medicaid funds from certain insurers capable of retroactively administering government Medicare and Medicaid funds. These insurers include, Aetna (AE), Blue Cross Complete (BCC), Total Health Care (THC), and Meridian (ME). Several of the other doctors were/are not credentialed and therefore services performed by those doctors should not be used to solicit Medicare and Medicaid funds for services that they render.

Defendant Bothra is responsible for determining how to categorize the services done by the non-credentialed doctors, and Co-Relators have knowledge of Defendant Bothra intentionally and improperly categorizing those services so to fraudulently solicit Medicare and/or Medicaid funds from the government. As such, many of the actual medical treatment that have been performed by those non-credentialed doctors have been attributed and billed in the names of the credentialed doctors, although the latter did not perform the treatment. In other words, Defendants would simply bill for work performed under a credentialed doctor's name, even though such work was actually performed by a non-credentialed doctor. This, in effect, allowed Defendants to fraudulently solicit Medicare and Medicaid funds from the government. (See **Exhibit A** – Pictures showing Defendants' fraudulent attributing of services done by an uncertified doctor, to that of a certified doctor)

For Example, work done by a Dr. Lewis (a non-credentialed doctor), was repeatedly billed under Dr. Kufner's name (credentialed doctor and the Co-Realtor). This was unbeknownst to Dr. Kufner. See examples of fraudulent billings below that Dr. Kufner discovered:

Document ID	Date	Doctor	Health Provider	Billed Under	Treatment 1
0001	12/10/16	LEWIS	THC	KUFNER	01992
0002	12/3/16	LEWIS	THC	KUFNER	01992
0003	12/3/16	LEWIS	THC	KUFNER	01992
0004	12/3/16	LEWIS	THC	KUFNER	01992
0005	12/3/16	LEWIS	THC	KUFNER	01992
0006	01/06/17	LEWIS	THC	KUFNER	01992
0007	01/06/17	LEWIS	THC	KUFNER	01992
0008	01/06/17	LEWIS	THC	KUFNER	01992
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0016	01/06/17	LEWIS	THC	KUFNER	01992
0017	01/06/17	LEWIS	THC	KUFNER	01992
0018	12/06/16	LEWIS	THC	EDU	01992
0019	11/02/16	LEWIS	THC	EDU	01991
0020	11/02/16	LEWIS	THC	EDU	LUMBAR EPIDERAL WITH FLURO
0021	02/08/17	LEWIS	THC	EDU	01992
0022	02/09/17	LEWIS	THC	EDU	01992
0023	12/06/16	LEWIS	THC	EDU	01992
0024	12/06/16	LEWIS	THC	EDU	01991
0025	12/06/16	LEWIS	THC	EDU	50
0026	11/03/16	LEWIS	THC	N/A	64493, 64494, 64495

0027	11/03/16	LEWIS	THC	N/A	01991
0028	11/29/16	LEWIS	THC	EDU	01992
0029	11/29/16	LEWIS	THC	EDU	01992
0030	11/26/16	LEWIS	THC	EDU	01992
0031	11/26/16	LEWIS	THC	EDU	01992
0032	11/26/16	LEWIS	THC	EDU	77003
0033	11/23/16	LEWIS	THC	EDU	27096
0034	11/23/16	LEWIS	THC	EDU	77003
0035	11/23/16	LEWIS	THC	EDU	27096 (X2)
0036	11/23/16	LEWIS	THC	N/A	77003
0037	11/23/16	LEWIS	THC	EDU	64493, 64494, 64495
0038	11/23/16	LEWIS	THC	EDU	62311
0039	11/23/16	LEWIS	THC	EDU	01992
0040	01/10/17	LEWIS	THC	EDU	01991
0041	01/10/17	LEWIS	THC	EDU	01991
0042	01/10/17	LEWIS	THC	EDU	01992
0043	12/20/16	LEWIS	THC	N/A	01992
0044	01/03/17	LEWIS	THC	EDU	01992
0045	12/20/16	LEWIS	THC	EDU	01991
0046	12/20/16	LEWIS	THC	EDU	01992
0047	12/13/16	LEWIS	THC	EDU	01992
0048	12/13/16	LEWIS	THC	EDU	01992
0049	12/8/16	LEWIS	THC	EDU	01991
0050	12/8/16	LEWIS	THC	EDU	01992
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0057	11/22/16	LEWIS	THC	EDU	01991
0058	11/17/16	LEWIS	THC	EDU	01991
0059	11/17/16	LEWIS	THC	BOTHRA	77003
0060	11/16/16	LEWIS	THC	EDU	99213
0061	11/07/16	LEWIS	THC	EDU	99213
0062	11/09/16	LEWIS	THC	EDU	99213
0063	12/02/16	LEWIS	N/A	EDU	99213
0064	12/19/16	LEWIS	N/A	EDU	99213

Please see attached **Exhibit B** for approximately 1,700 examples of the fraudulent billing practices. The Co-Relators believe that there may well be other instances of this behavior that has yet to been uncovered, and that the number of occurrences could be substantial.

Because of this scheme, many of the submission that have been made (and continue to be made) to the government to solicit Medicare and Medicaid funds were and are false and fraudulent.

b. **Fraudulent Billing for Durable Medical Equipment:**

Defendants provide a wide range of services including allegedly providing Durable Medical Equipment to their patients.

Co-Relators have knowledge that Defendants fraudulently bill and solicit money from the government for unnecessary DME. Such equipment includes back braces and shoulder braces. Each back brace costs the government approximately $1200 - $1800, while each shoulder brace costs the government approximately $800.

Co-Relators have knowledge of Defendants improperly billing for equipment such as shoulder and back braces, when such equipment is unnecessary. For example, Defendants have over 100 new patients per month. Of those, the majority are ordered back braces and/or shoulder braces. Even though the government pays for such equipment through Medicare and Medicaid, some patients never actually receive those braces.

Many of the patients that do actually receive those braces fail to receive proper instruction as to the use of these devices, and some leave the clinic unaware of the purpose.

Additionally, there is little or no documentation of the patient's continued use of the device or its effect on the patient's medical condition.

Co-Relators are aware of the pressures to provide DME, as evidenced by the magnitude of the prescribing practice and the notes left by Dr. Bothra instructing the other doctors to bill for back and shoulder braces.

Defendants have been providing DME services for approximately 6 years now. Defendants have made a substantial amount of income by using their DME privileges to fraudulently bill the government and solicit Medicare and Medicaid funds. Such a scheme continues today.

c. **Fraudulent Billing Under the Ambulatory Surgical Center for Providing Services Not Meeting Proper Standards:**

Ambulatory Surgical Centers (ASCs) are required to be in compliance with the Federal requirements set forth in the Medicare Conditions for Coverage (CfC) in order to receive Medicare/Medicaid payment.

Defendants currently have one operating room that is ASC certified. For operations conducted in these operating rooms by certified doctors, Defendants are able to solicit the government for two types of fees: a facility fee (for operating in an ASC compliant room) and a professional fee (for an ASC certified doctor operating in an ASC compliant room).

Defendants' current and only ASC certified operating room did not come into existence until December 24, 2015, but it was not ASC certified by the CMS until February of 2017. Prior to receiving this ASC certification however, Defendants were billing the government for services done by ASC certified doctors in non-ASC operating rooms, as if those services were being done by those doctors in facilities that were ASC certified. Defendants would simply bill the government for a professional fee, knowing that CMS will not verify whether those services were rendered in an ASC certified operating room. Co-Relators have knowledge that Defendants did not become ASC certified by the CMS until February 18, 2017, yet throughout 2016 Defendants were fraudulently billing the government for services and representing that those services were done in an ASC operating room.

Furthermore, Defendants have stated an objective of having two functioning operating rooms at full capacity, performing up to 50 cases per day in each room, five or more days a week.

Currently there are two rooms: a procedure room which is not ASC approved, and an operating room which is considered ASC approved. For operations in the ASC approved room, a doctor can bill for approximately four times the amount than he would have been able to in a non-ASC approved room. However, to maintain status as an ASC approved operating room,

there are more regulations that must be adhered to. Such regulations were developed by the Centers for Medicare & Medicaid Services (CMS). Also, the process from admission, to injection, to discharge is much simpler and faster in a non-ASC room as compared to an ASC approved one.

As observed by the Co-Relators, the policies and procedures set forth for certification as an ASC by CMS were observed and practiced to a large extent only when the clinic approached an inspection. In fact, as demonstrated in **Exhibit C,** on October 18, 2016 Defendants were subject to an unannounced inspection by The Joint Commission (which conducts compliance inspections for CMS) in order to determine whether Defendants' actions were in compliance with ASC regulations. The Joint Commission then issued a 44 page report finding Defendants not in compliance with ASC standards. Although Defendants were more prepared for their next inspection and ultimately received ASC certification, Co-Relators have personal knowledge of Defendants still continuing to violate many of the ASC regulations to this day.

Furthermore, Co-Relators have personal knowledge of certain CMS standards and procedures that are being disregarded by Defendants, which include but are not limited to, procedures being performed in the non-ASC-approved operating room, yet Defendants still improperly bill the government for reimbursement by portraying that such services were actually performed in an ASC approved room. In other words, Defendants intentionally bill the government for a "facility fee", representing that certain services were done in an ASC certified operating room, when in reality, those services were done in a non-ASC certified room and therefore are not entitled to receive a "facility fee".

Another example of procedures being performed by Defendants, while not meeting standards to qualify for billing the government, is seen in the handling and administering of dose vials. CMS requires that only single dose vials be used in the ASC operating room, and that they be used only on a single patient. Multiple dose vials are not to be used, unless such vials are used to fill a syringe with a single vial outside of the operating room, and then brought in (after being properly labelled). Like many other regulations, Defendants do not adhere to this. Rather, single and multiple vials are commingled in the operating room, and both are used on multiple patients and stored overnight.

Co-Relators also have knowledge of other violations of CMS regulations including, but not limited to, 1) failing to properly train and educate staff members and ensure that such members are properly licensed and/or certified to be performing the work that is being administered, 2) failing to properly examine and maintain the equipment within the facilities so to ensure that such equipment is in good working order, and to determine whether certain environmental and sanitary requirements have been met (see **Exhibit D** – Equipment Monitoring log, which was discovered on May 10, 2017 as fraudulently filled out for the entire month of May 2017), 3) failing to properly maintain and ensure that the Medical Gas and Oxygen Logs are completed properly as required by CMS for the ASC to exist, 4) failing to complete a comprehensive medical history and physical assessment within 30 days of the date of planned surgery (rather, such assessments have often been completed afterwards), 5) failing to conduct

surgical procedures in compliance with the ASC standards set to avoid wrong site/wrong person/wrong procedure errors, 6) failing to secure patient care supplies (as required by CMS), including syringes, needles, and potentially injurious medications, 7) failing to secure access to the operative and recovery area of the facilities, thereby allowing patients unfettered access into the pre and post op areas, 8) failing to appropriately clean between surgical cases, 9) failing to train all surgical staff in the use of emergency equipment, 10) failing to have patients sign informed consent forms in the manner required by CMS, 11) failing to properly train or supervise staff members in compliance with the standards set by CMS for the ASC to exist, and 12) failing to have at least the required minimum nursing staff during, pre, post, and intra operating procedures. As demonstrated in **Exhibit C,** many of these existing violations mirror that which existed in October 2016 when Defendants failed their first inspection.

V. CONCLUSION

Even though Defendants know that federal and state Medicare and Medicaid laws and regulations require all forms and requests for payments submitted to the respective governmental departments to be truthful, accurate, and complete, Defendants have intentionally disregarded this obligation, but instead have engaged in a calculated scheme to defraud the United States Government and State of Michigan out of millions of dollar. As such, Defendants are liable for treble the amount of the United States and the State of Michigan's damages, including any other relief allowable under the *Qui Tam* provisions of the Federal False Claims Act, being 31 USC 3729 et. seq, and the Michigan Medicaid False Claims Act, being MCL 400.610a.

Respectfully submitted,

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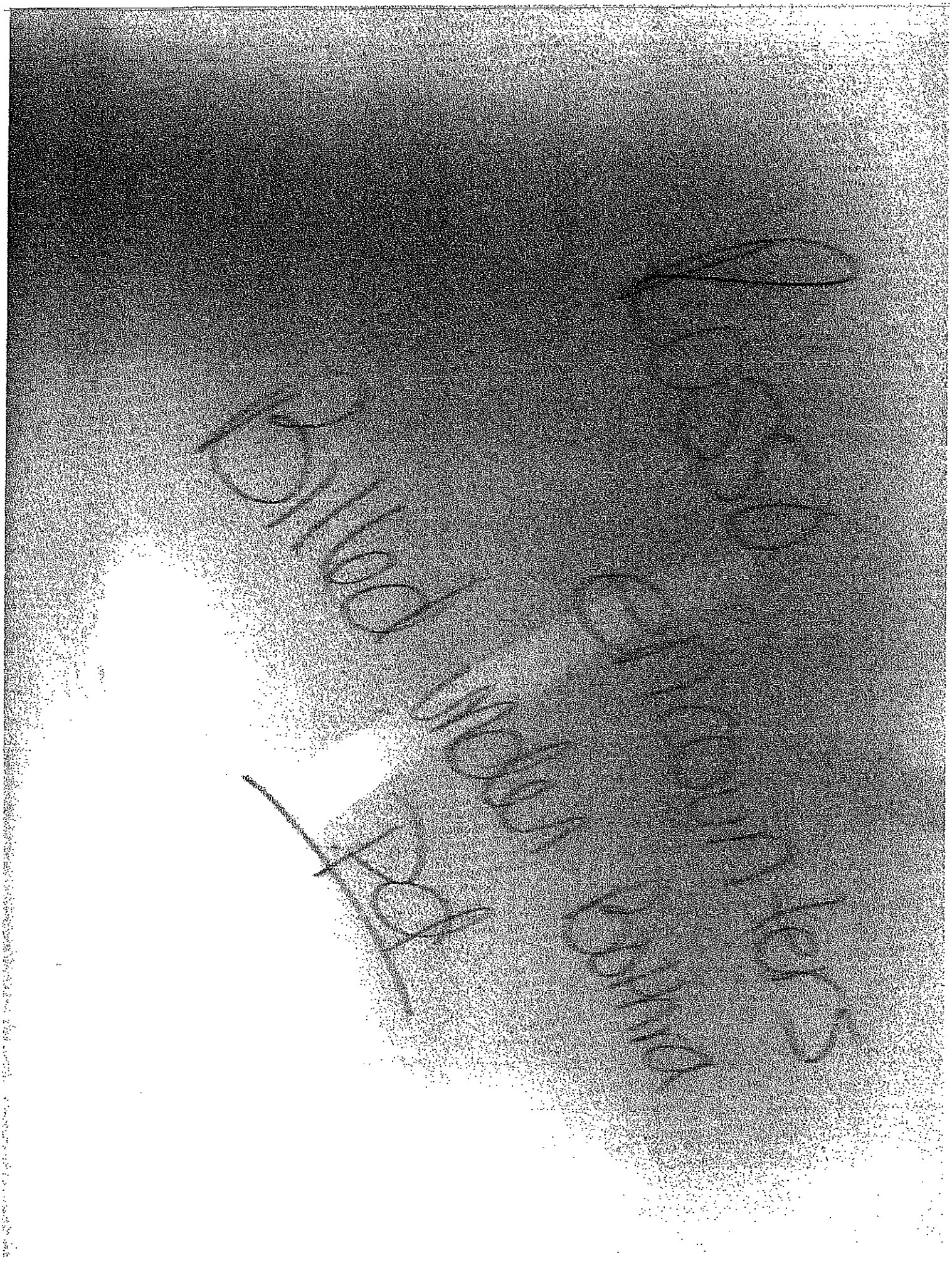
DATED: May 24, 2017

O:\Kufner, Ronald\Pleadings - Draft\MEMORANDUM to fed govt.doc

EXHIBIT B



Cawis billed under Bahia

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11.2	[redacted]	107.37
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11.9	[redacted]	163.83
11.16	[redacted]	176.80
11.16	[redacted]	332.22
11.16	[redacted]	165.60
11.30	[redacted]	176.80
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1.5	[redacted]	129.94
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1.5	[redacted]	35.86
1.23	[redacted]	63.73
1.7	[redacted]	26.49
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1.7	[redacted]	41.42
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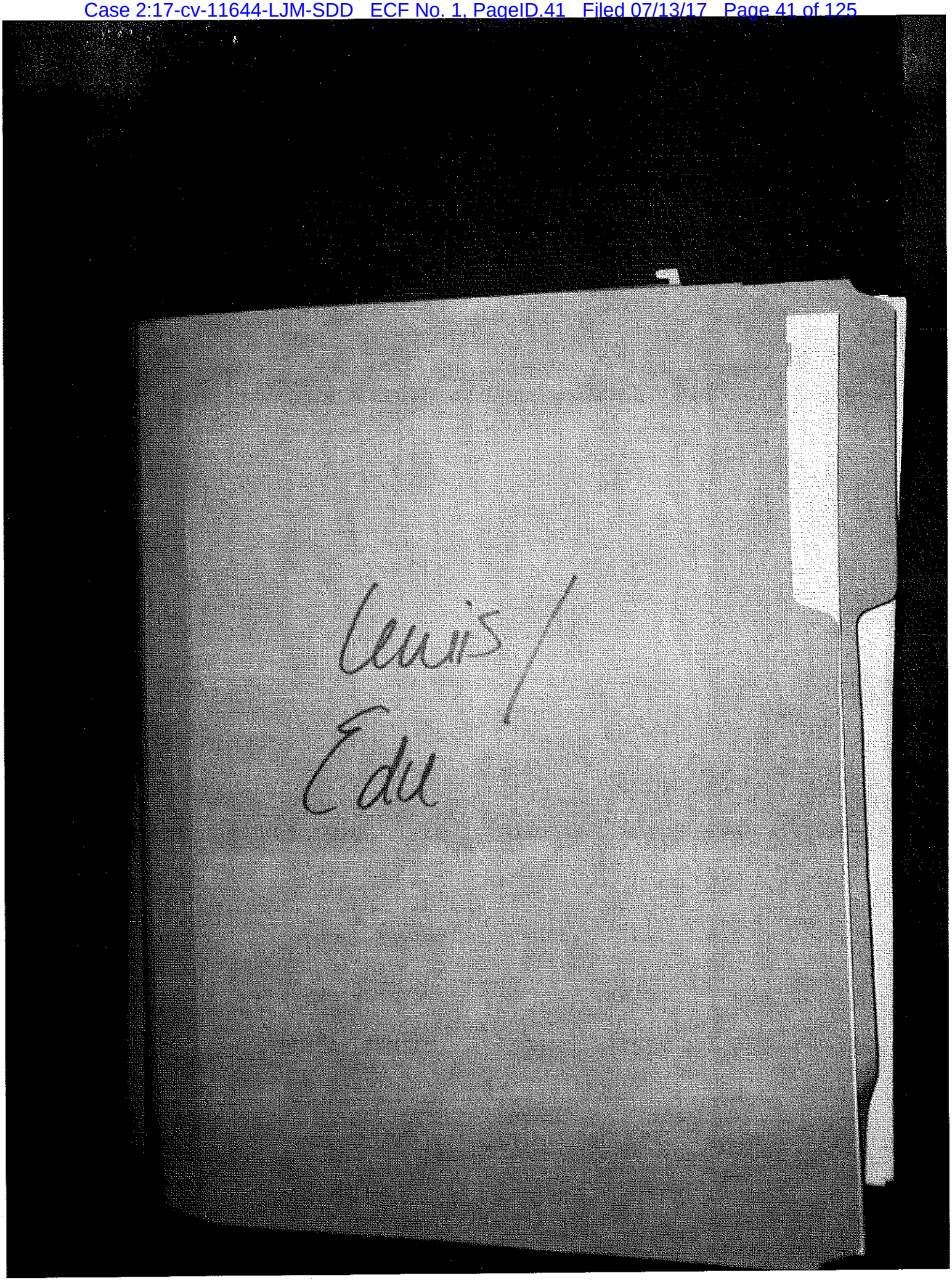
1.7	[redacted]	50.49
12.6	[redacted]	76.49


Lewis
Edu


Dr. Lewis
procedures
billed under
Bethina

EXHIBIT C

Document ID	Date	Doctor	Health Prov	Billed Under	Treatment 1	Treatment 2	Treatment 3	TREATMENT 4	TREATMENT 4
0001	12/10/16	Lewis	THC	KUFNER	01992				
0002	12/3/16	LEWIS	THC	KUFNER	01992				
0003	12/3/16	LEWIS	THC	KUFNER	01992				
0004	12/3/16	LEWIS	THC	KUFNER	01992				
0005	12/3/16	LEWIS	THC	KUFNER	01992				
0006	01/06/17	LEWIS	THC	KUFNER	01992				
0007	01/06/17	LEWIS	THC	KUFNER	01992				
0008	01/06/17	LEWIS	THC	KUFNER	01992				
0009	01/06/17	LEWIS	THC	KUFNER	01992				
0010	01/06/17	LEWIS	THC	KUFNER	01992				
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0017	01/06/17	LEWIS	THC	KUFNER	01992				
0018	12/06/16	LEWIS	THC	EDU	01992				
0019	11/02/16	LEWIS	THC	EDU	01991				
0020	11/02/16	LEWIS	THC	EDU	LUMBAR EPIDERAL WITH FLURO	77003	J3301		
0021	02/08/17	LEWIS	THC	EDU	01992				
0022	02/09/17	LEWIS	THC	EDU	01992				
0023	12/06/16	LEWIS	THC	EDU	01992				
0024	12/06/16	LEWIS	THC	EDU	01991				
0025	12/06/16	LEWIS	THC	EDU	50	64483	77003	J3301	
0026	11/03/16	LEWIS	THC	N/A	64493, 64494, 64495	77003	50	J3301	
0027	11/03/16	LEWIS	THC	N/A	01991	01992			
0028	11/29/16	LEWIS	THC	EDU	01992				
0029	11/29/16	LEWIS	THC	EDU	01992				
0030	11/26/16	LEWIS	THC	EDU	01992				
0031	11/26/16	LEWIS	THC	EDU	01992				
0032	11/26/16	LEWIS	THC	EDU	77003	64635, 64636 (X2)	J3301		
0033	11/23/16	LEWIS	THC	EDU	27096	77003	J3301		
0034	11/23/16	LEWIS	THC	EDU	77003	64635, 64636 (X3)	J3301		
0035	11/23/16	LEWIS	THC	EDU	27096 (X2)	77003	50	J3301	
0036	11/23/16	LEWIS	THC	N/A	77003	64635, 64636 (X2)	J3301		
0037	11/23/16	LEWIS	THC	EDU	64493, 64494, 64495	77003	50	J3301	
0038	11/23/16	LEWIS	THC	EDU	62311	77003	J3301		
0039	11/23/16	LEWIS	THC	EDU	01992				
0040	01/10/17	LEWIS	THC	EDU	01991				
0041	01/10/17	LEWIS	THC	EDU	01991				
0042	01/10/17	LEWIS	THC	EDU	01992				
0043	12/20/16	LEWIS	THC	N/A	01992				
0044	01/03/17	LEWIS	THC	EDU	01992				
0045	12/20/16	LEWIS	THC	EDU	01991				
0046	12/20/16	LEWIS	THC	EDU	01992				
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0050	12/8/16	LEWIS	THC	EDU	01992				
0051	12/8/16	LEWIS	THC	EDU	01991				
0052	12/06/16	LEWIS	THC	EDU	01991				
0053	12/13/16	LEWIS	THC	EDU	01992				
0054	12/13/16	LEWIS	THC	EDU	01991				
0055	12/13/16	LEWIS	THC	EDU	01992				

LEGEND
MB=MEDICARE PLUS BLUE
BC= BLUE CROSS BLUE SHIELD SELF
ME= MERIDIAN
THC= TOTAL HEALTH CARE
MD= MEDICAID
HP- HAP SENIOR PLUS (MEDICAIRE?)
BCN-=BLUE CARE NETWORK
PH= ??? DOCUMENT 000418
D2 (MD2)= MEDICAID SECONDARY
BCCOM= BLUE CROSS COMPLETE

0056	01/10/17	LEWIS	THC	EDU	01992				
0057	11/22/16	LEWIS	THC	EDU	01991				
0058	11/17/16	LEWIS	THC	EDU	01991				
0059	11/17/16	LEWIS	THC	BOTHRA	77003	J3301			
0060	11/16/16	LEWIS	THC	EDU	99213				
0061	11/07/16	LEWIS	THC	EDU	99213				
0062	11/09/16	LEWIS	THC	EDU	99213	20600	J3301		
0063	12/02/16	LEWIS	N/A	EDU	99213	80101	V5869		
0064	12/19/16	LEWIS	N/A	EDU	99213				
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0069		LEWIS	THC	N/A	62311	77003	J3301		
0070		LEWIS	THC	N/A	27096	77003	J3301		
0071		LEWIS	THC	N/A	62311	77003	J3301		
0072		LEWIS	THC	N/A	77003	64635,64636 (X2)	J3301		
0073		LEWIS	THC	N/A	77003	64634, 64635	J3301		
0074		LEWIS	THC	N/A	63311	77003			
0075		LEWIS	THC	N/A	62311	77003	J3301		
0076		LEWIS	THC	N/A	77003	50	64483	J3301	
0077		LEWIS	AE?	N/A	77003	96365	64635,64636 (X2)	J3301	
0078		LEWIS	?	N/A	62311	96365	J3301		
0079		LEWIS	THC	N/A	99213				
0080		LEWIS	THC	N/A	99213				
0081		LEWIS	THC	N/A	99213	80101	V5869		
0082		LEWIS	THC	N/A	99213				
0083		LEWIS	THC	N/A	99213				
0084		LEWIS	THC	N/A	99213				
0085		LEWIS	THC	N/A	99213				
0086		LEWIS	THC	N/A	99213	80101	V5869		
0087		LEWIS	ME	N/A	99203	L0650	80101	V5869	
0088		LEWIS	ME	N/A	99203	L0650	80101	V5869	
0089		LEWIS	THC	N/A	99203	80101	V5869		
0090		LEWIS	THC	N/A	99213				
0091		LEWIS	THC	N/A	99213				
0092		LEWIS	THC	N/A	99213				
0093		LEWIS	THC	N/A	99213				
0094		LEWIS	THC	N/A	99213				
0095		LEWIS	THC	N/A	99213				
0096		LEWIS	THC	N/A	99213				
0097		LEWIS	THC	N/A	99213				
0098		LEWIS	THC	N/A	99213				
0099		LEWIS	THC	N/A	99213				
0100		LEWIS	THC	N/A	99213				
0101		LEWIS	THC	N/A	99203	80101	V5869		
0102		LEWIS	THC	N/A	99213				
0103		LEWIS	THC	N/A	99213	80101	V5869		
0104		LEWIS	THC	N/A	99213	J3301	V5869		
0105		LEWIS	THC	N/A	99213				
0106		LEWIS	THC	N/A	99213				
0107		LEWIS	THC	N/A	99213				
0108		LEWIS	THC	N/A	99213	80101	V5869		
0109		LEWIS	THC	N/A	99213				
0110		LEWIS	THC	N/A	99213	76942	20526	J1100	
0111		LEWIS	THC	N/A	99213				

0112	LEWIS	THC	N/A	99213					
0113	LEWIS	THC	N/A	99213					
0114	LEWIS	THC	N/A	99213					
0115	LEWIS	THC	N/A	77003	64634, 64635 (X3)	J3301			
0116	LEWIS	THC	N/A	77003	64635, 64636 (X3)	J3301			
0117	LEWIS	THC	N/A	62311	77002	J3301			
0118	LEWIS	THC	N/A	77003	50	64483, 64484	J3301		
0119	LEWIS	THC	N/A	27096 (X2)	50	J3301	80101, V5869		
0120	LEWIS	THC	N/A	64490,64491,64492	77003	50	J3301		
0121	LEWIS	THC	N/A	77002	20610	J3301			
0122	LEWIS	THC	N/A	77002	20610	J3301			
0123	LEWIS	THC	N/A	77003	6448, 64484	J3301			
0124	LEWIS	THC	N/A	64490,64491,64492	77003	J3301			
0125	LEWIS	THC	N/A	77003	64635, 64636	J3301			
0126	LEWIS	THC	N/A	77003	20610	J3301(X2)			
0127	LEWIS	THC	N/A	64493, 64494, 64495	77003	50	J3301		
0128	LEWIS	ME	N/A	99213					
0129	LEWIS	ME	N/A	99203	99070	80101	V5869		
0130	LEWIS	ME	N/A	99213					
0131	LEWIS	ME	N/A	99213					
0132	LEWIS	ME	N/A	99213					
0133	LEWIS	ME	N/A	99213					
0134	LEWIS	ME	N/A	99213					
0135	LEWIS	ME	N/A	99203	L0650	80101	V5869		
0136	LEWIS	ME	N/A	99213					
0137	LEWIS	ME	N/A	99213					
0138	LEWIS	ME	N/A	99213	L1833, L2397				
0139	LEWIS	MB	N/A	99213					
0140	LEWIS	BC	N/A	99213	80101	V5869			
0141	LEWIS	BC	N/A	99213					
0142	LEWIS	BC	N/A	99213					
0143	LEWIS	BC, MD2	N/A	99213					
0144	LEWIS	BC	N/A	99213					
0145	LEWIS	HP	N/A	99213					
0146	LEWIS	MB	N/A	99213					
0147	LEWIS	MB	N/A	99213					
0148	LEWIS	ME	N/A	77003	20610	J3301			
0149	LEWIS	ME	N/A	64490,64491,64492	77003	50	96365	J3301	
0150	LEWIS	ME	N/A	64490,64491,64492	50	96365	J3301		
0151	LEWIS	MB	N/A	99213	G0431	V5869			
0152	LEWIS	MB	N/A	99213	G0431	V5869			
0153	LEWIS	MB	N/A	99213					
0154	LEWIS	MB	N/A	99213					
0155	LEWIS	MB	N/A	99213					
0156	LEWIS	MB	N/A	99213					
0157	LEWIS	MB	N/A	99213					
0158	LEWIS	MB	N/A	99213					
0159	N/A	MB	N/A	99213					
0160	LEWIS	MB	N/A	99213	80101	V5869			
0161	LEWIS	MB	N/A	99213					
0162	LEWIS	ME	N/A	99213	80101	V5869			
0163	LEWIS	ME	N/A	99213					
0164	BOTHRA	ME	N/A	76942	20526	J1100			
0165	LEWIS	ME	N/A	99213					
0166	LEWIS	ME	N/A	99213					
0167	LEWIS	ME	N/A	99213					

0168	LEWIS	ME	N/A	99213			
0169	LEWIS	ME	N/A	99213			
0170	LEWIS	ME	N/A	99213			
0171	LEWIS	ME	N/A	99213			
0172	LEWIS	ME	N/A	99213			
0173	LEWIS	ME	N/A	99023	L0120	80101	V5869
0174	LEWIS	ME	N/A	99023	L0650	80101	V5869
0175	LEWIS	ME	N/A	99213	80101	V5869	
0176	LEWIS	ME	N/A	99213			
0177	LEWIS	ME	N/A	99213			
0178	LEWIS	ME	N/A	99023	L0650	80101	V5869
0179	LEWIS	ME	N/A	99023	L0650	80101	V5869
0180	LEWIS	ME	N/A	99213			
0181	LEWIS	ME	N/A	99203	L3660	80101	V5869
0182	LEWIS	ME	N/A	99203	L0650	80101	V5869
0183	LEWIS	ME	N/A	99213			
0184	LEWIS	ME	N/A	99213			
0185	LEWIS	ME	N/A	99213			
0186	LEWIS	ME	N/A	99213	L1833	L2397	
0187	LEWIS	ME	N/A	99213			
0188	LEWIS	ME	N/A	99213			
0189	LEWIS	ME	N/A	99213			
0190	LEWIS	ME	N/A	99023	L0650	80101	V5869
0191	LEWIS	ME	N/A	99213			
0192	LEWIS	ME	N/A	99203	L0120	80101	V5869
0193	LEWIS	ME	N/A	99203	L0650	80101	V5869
0194	LEWIS	ME	N/A	99203	L0650	80101	V5869
0195	LEWIS	ME	N/A	99213			
0196	LEWIS	BC	N/A	99213	80101	V5868	
0197	LEWIS	ME	N/A	99213			
0198	LEWIS	ME	N/A	99213			
0199	LEWIS	ME	N/A	99203	L0650	80101	V5869
0200	LEWIS	ME	N/A	99213			
0201	LEWIS	ME	N/A	99203	L0650	80101	V5869
0202	LEWIS	ME	N/A	99203	L0650	80101	V5869
0203	LEWIS	ME	N/A	99203	80101	V5869	
0204	LEWIS	ME	N/A	99213			
0205	LEWIS	ME	N/A	99213			
0206	LEWIS	ME	N/A	99205	L0650	80101	V5869
0207	LEWIS	ME	N/A	99203	G0431	V5869	
0208	LEWIS	ME	N/A	99204	L3660	80101	V5869
0209	LEWIS	ME	N/A	99213			
0210	LEWIS	ME	N/A	99213			
0211	LEWIS	ME	N/A	99212 ?	80101	V5869	
0212	LEWIS	ME	N/A	99023	80101	V5869	
0213	LEWIS	ME	N/A	99213			
0214	LEWIS	ME	N/A	99213	20553	J3301(X2)	
0215	LEWIS	ME,MD	N/A	99213			
0216	LEWIS	ME	N/A	99213			
0217	LEWIS	THC	N/A	99213			
0218	LEWIS	THC	N/A	99203	99070	80101	V5869
0219	LEWIS	THC	N/A	99213			
0220	LEWIS	THC	N/A	99213			
0221	LEWIS	THC	N/A	99213			
0222	LEWIS	THC	N/A	99213			
0223	LEWIS	THC	N/A	99213			

0224	LEWIS	THC	N/A	99213			
0225	LEWIS	THC	N/A	99213			
0226	LEWIS	THC	N/A	99213			
0227	LEWIS	THC	N/A	99203	80101	V5869	
0228	LEWIS	THC	N/A	99213			
0229	LEWIS	THC	N/A	99213	80101	V5869	
0230	LEWIS	THC	N/A	99213			
0231	LEWIS	THC	N/A	99213			
0232	LEWIS	THC	N/A	99213			
0233	LEWIS	THC	N/A	99213	80101	V5869	
0234	LEWIS	THC	N/A	99213			
0235	LEWIS	THC	N/A	99213			
0236	LEWIS	THC	N/A	99213	80101	V5869	
0237	LEWIS	THC	N/A	99213			
0238	LEWIS	THC	N/A	99213			
0239	LEWIS	THC	N/A	99213			
0240	LEWIS	THC	N/A	99213	80101	V5869	
0241	LEWIS	THC	N/A	99213			
0242	LEWIS	THC	N/A	99213			
0243	LEWIS	BC	N/A	99213	80101	V5869	
0244	LEWIS	THC	N/A	99213			
0245	LEWIS	THC	N/A	99213	80101	V5869	
0246	LEWIS	THC	N/A	99213			
0247	LEWIS	THC	N/A	99213			
0248	LEWIS	THC	N/A	99213	20553	j1100	
0249	LEWIS	THC	N/A	99213			
0250	LEWIS	THC	N/A	99213			
0251	LEWIS	THC	N/A	99213			
0252	LEWIS	THC	N/A	99213			
0253	LEWIS	THC	N/A	99213			
0254	LEWIS	THC	N/A	99213	25		
0255	LEWIS	THC	N/A	99213			
0256	LEWIS	THC	N/A	99213			
0257	LEWIS	THC	N/A	99213			
0258	LEWIS	THC	N/A	99213	80101	V5869	
0259	LEWIS	THC	N/A	99213			
0260	LEWIS	THC	N/A	99213			
0261	LEWIS	THC	N/A	99213			
0262	LEWIS	THC	N/A	99213			
0263	LEWIS	THC	N/A	99213			
0264	LEWIS	THC	N/A	99213			
0265	LEWIS	THC	N/A	99213			
0266	LEWIS	THC	N/A	99213			
0267	LEWIS	THC	N/A	99213			
0268	LEWIS	THC	N/A	99213			
0269	LEWIS	THC	N/A	99213			
0270	LEWIS	THC	N/A	99203	99070	80101	V5869
0271	LEWIS	THC	N/A	99023	99070	80101	V5869
0272	LEWIS	THC	N/A	99023	80101	V5869	
0273	LEWIS	THC	N/A	99213			
0274	LEWIS	THC	N/A	99213			
0275	LEWIS	BC	N/A	99023	L0650	80101	V5869
0276	LEWIS	BC	N/A	99213			
0277	LEWIS	BC	N/A	99213			
0278	LEWIS	BC	N/A	99213			
0279	LEWIS	BC	N/A	99213			

0280		LEWIS	BC	N/A	99213					
0281		LEWIS	BC	N/A	99213					
0282		LEWIS	BC, MD	N/A	99023	L0650	80101	V5869		
0283		LEWIS	BC	N/A	99023	L0650	80101	V5869		
0284		LEWIS	BC	N/A	99214 ?					
0285	11/18/16	LEWIS	BC	N/A	99213					
0286	11/18/16	LEWIS	BCN	EDU	99213	80101	V5869			
0287		LEWIS	BC	N/A	99213	j1100	20600			
0288		LEWIS	BC	N/A	99213					
0289		LEWIS	BC	N/A	99213					
0290		LEWIS	BC	N/A	99213					
0291		LEWIS	BC	N/A	99213					
0292		LEWIS	ME	N/A	96365	62311	77003	j3301 (X2)		
0293		LEWIS	ME	N/A	27096	77003	01992,96365	J3301		
0294		LEWIS	ME	N/A	77003	50	96365	64483	J3301	
0295		LEWIS	ME	N/A	77003	96365	64483,64484 (X3)	J3301		
0296		LEWIS	ME	N/A	27096	77003	50	96365	J3301 (X2)	
0297		LEWIS	ME	N/A	77002	J3301	20610			
0298		LEWIS	ME	N/A	77003	64483, 64484	J3301			
0299		LEWIS	ME	N/A	77003	50	64483	j3301		
0300		LEWIS	ME	N/A	50	77003	64493,64494,64495	J3301	8010, V5869	
0301		LEWIS	ME	N/A	62311	77003	96365	J3301	J1100	
0302		LEWIS	ME	N/A	27096	77003	50	96365	J3301	
0303		LEWIS	ME	N/A	62311	77003	96365	J3301		
0304		LEWIS	ME	N/A	64493,64494,64495	77003	50	96365	J3301	
0305		LEWIS	ME	N/A	27096	77603	50	96365	J3	
0306		LEWIS	ME	N/A	62311	77003	96365			
0307		LEWIS	ME	N/A	62311	96365	j3301			
0308		LEWIS	ME	N/A	62311	77003	96365	J3301		
0309		LEWIS	ME	N/A	77003	20610	j3301			
0310		LEWIS	ME	N/A	62311	77003	96365, 01992	j3301 (X2)		
0311		LEWIS	ME	N/A	27096	77003	96365, 01992	J3301		
0312		LEWIS	ME	N/A	77003	50	64483	J3301		
0313		LEWIS	ME	N/A	77003	96365	j3301	64483,64484 (X3)		
0314		LEWIS	ME	N/A	27096	77003	50	96365	J3301 (X2)	
0315		LEWIS	ME	N/A	77002	20610	J3301			
0316		LEWIS	ME	N/A	77003	64483, 64484	j3301			
0317		LEWIS	ME	N/A	77003	50	64483	J3301		
0318		LEWIS	ME	N/A	64493,64494,64495	77003	50	J3301	8010, V5869	
0319		LEWIS	ME	N/A	62311	77003	96365	J3301	J1100	
0320		LEWIS	ME	N/A	27096	77003	50	96365	J3301	
0321		LEWIS	ME	N/A	62311	77003	96365	J3301		
0322		LEWIS	ME	N/A	64493,64494,64495	77003	50	96365	J3301	
0323		LEWIS	ME	N/A	27096	77003	50	96365	J3301	
0324		LEWIS	ME	N/A	62311	77003	96365			
0325		LEWIS	ME	N/A	62311	77003	96365	J3301		
0326		LEWIS	ME	N/A	62311	77003	96365	j3301 (X2)		
0327		LEWIS	ME	N/A	20610	77003	j3301			
0328		LEWIS	ME	N/A	62311	77003	96365	j3301 (X2)		
0329		LEWIS	ME	N/A	27096	77003	01992,96365	J3301		
0330		LEWIS	ME	N/A	50	77003	96365	64483	J3301	
0331		LEWIS	ME	N/A	96365	77003	64483,64484 (X3)	J3301		
0332		LEWIS	ME	N/A	27096	77003	50	96365	J3301 (X2)	
0333		LEWIS	ME	N/A	20610	77002	j3301			
0334		LEWIS	ME	N/A	64483,64484	77003	j3301			
0335		LEWIS	ME	N/A	50	77003	64483	J3301		

0336		LEWIS	ME	N/A	64493,64494,64495	77003	50	J3301	8010, V5869
0337		LEWIS	ME	N/A	62311	77003	96365	J3301	J1100
0338		LEWIS	ME	N/A	27096	77003	50	96365	J3301
0339		LEWIS	ME	N/A	62311	77003	96365	J3301	
0340		LEWIS	ME	N/A	64493,64494,64495	77003	50	96365	J3301
0341		LEWIS	ME	N/A	27096	77003	50	96365	J3301
0342		LEWIS	ME	N/A	62311	77003	96365		
0343		LEWIS	ME	N/A	62311	77003	96365	J3301	
0344		LEWIS	ME	N/A	62311	77003	96365	j3301 (X2)	
0345		LEWIS	ME	N/A	99213				
0346		LEWIS	ME	N/A	99213				
0347		LEWIS	ME	N/A	99213				
0348		LEWIS	ME	N/A	99203				
0349		LEWIS	ME	N/A	99213				
0350		LEWIS	ME	N/A	99213				
0351		LEWIS	ME	N/A	99213				
0352		LEWIS	ME	N/A	99213				
0353		LEWIS	ME	N/A	99203				
0354		LEWIS	ME	N/A	99203	L0650	80101	V5869	
0355		LEWIS	ME	N/A	99213				
0356		LEWIS	ME	N/A	99204	L0650	99070	80101	V5869
0357		LEWIS	ME	N/A	99203	L0650	80101	V5869	
0358		LEWIS	ME	N/A	99203	L0650	99070	80101	V5869
0359		LEWIS	ME	N/A	99213				
0360		LEWIS	ME	N/A	99213				
0361		LEWIS	ME	N/A	99213				
0362		LEWIS	ME	N/A	99213				
0363	11/14/16	LEWIS	ME	BOTHRA	99203	L0650	99070	80101	V5869
0364		LEWIS	ME	N/A	99213				
0365		LEWIS	ME	N/A	99213				
0366		LEWIS	ME	N/A	99213				
0367		LEWIS	ME	N/A	99213				
0368		LEWIS	ME	N/A	99203	L0650	80101	V5869	
0369		LEWIS	ME	N/A	99213				
0370		LEWIS	ME	N/A	99213				
0371		LEWIS	ME	N/A	99213				
0372		LEWIS	ME	N/A	99213				
0373		LEWIS	ME	N/A	99203	L0650	80101	V5869	
0374		LEWIS	ME	N/A	99203	L0650	80101	V5869	
0375		LEWIS	ME	N/A	99213				
0376		LEWIS	ME	N/A	99204	L0650	99070	80101	V5869
0377		LEWIS	ME	N/A	99203	L0650	80101	V5869	
0378		LEWIS	ME	N/A	99203	L0650	99070	80101	V5869
0379		LEWIS	ME	N/A	99213				
0380		LEWIS	ME	N/A	99213				
0381		LEWIS	ME	N/A	99213				
0382		LEWIS	ME	N/A	99213				
0383	11/14/16	LEWIS	ME	BOTHRA	99203	L0650	99070	80101	V5869
0384		LEWIS	ME	N/A	99213				
0385	11/14/16	LEWIS	ME	BOTHRA	99203	L0650	99070	80101	V5869
0386		LEWIS	ME	N/A	99213				
0387		LEWIS	THC	N/A	J3301	CEV/THOR EPIDERAL WITH FLURO		77003	
0388		LEWIS	THC	N/A	64635,64636 (X2)	J3301		77003	
0389		LEWIS	THC	N/A	J3301	77003		27096 (X)	
0390		LEWIS	THC	N/A	50	J3301	20610	77003	
0391		LEWIS	THC	N/A	27096 (X2)	50	j3301	77003	

0392		LEWIS	THC	N/A	64493,64494,64495	50	77003	J3301	
0393		LEWIS	THC	N/A	77003	64483, 64484	j3301		
0394		LEWIS	THC	N/A	77003	J3301	CEV/THOR EPRIDERAL WITH FLUID		
0395		LEWIS	THC	N/A	64493,64494,64495	50	j3301	77003	
0396		LEWIS	THC	N/A	77002	50	20610	J3301	
0397		LEWIS	THC	N/A	77002	20610	j3301		
0398		LEWIS	THC	N/A	77003	J3301	LUMBAR EPIDURAL W FLURO		
0399		LEWIS	THC	N/A	77003	64483, 64484	j3301		
0400		LEWIS	THC	N/A	77002	20610	j3301	80101	V5869
0401		LEWIS	THC	N/A	27096	64635,64636 (X3)	j3301		
0402		LEWIS	THC	N/A	77003	64483, 64484	j3301		
0403		LEWIS	THC	N/A	27096	J3301			
0404		LEWIS	THC	N/A	27096 (X2)	77003	50	J3301	8010, V5869
0405		LEWIS	THC	N/A	77003	64635,64636 (X2)	j3301		
0406		LEWIS	THC	N/A	77002	20610	j3301		
0407		LEWIS	THC	N/A	77003	J3301	64490,64491,64491		
0408		LEWIS	THC	N/A	77003	64483, 64484	j3301		
0409		LEWIS	THC	N/A	77003	64483, 64484	j3301		
0410		LEWIS	THC	N/A	27096 (X2)	77003	50	J3301	
0411		LEWIS	THC	N/A	77002	20610	j3301 (X2)		
0412		LEWIS	THC	N/A	77003	50	64483	J3301	
0413		LEWIS	THC	N/A	77003	27096	50	J3301	
0414		LEWIS	THC	N/A	77003	64635,64636 (X3)	80101	V5869	
0415		LEWIS	THC	N/A	77003	64483, 64484	j3301	80101	V5869
0416		LEWIS	THC	N/A	77003	64483	j3301		
0417		LEWIS	THC	N/A	77003	J3301	LUMBAR EPIDURAL W/ FLURO		
0418	2/24/17	LEWIS	PH- COULD BE EDU		99213				
0419		LEWIS	THC	N/A	99213				
0420		LEWIS	THC	N/A	99213				
0421		LEWIS	THC	N/A	99213	80101	V5869		
0422		LEWIS	THC	N/A	99213				
0423		LEWIS	THC	N/A	99213				
0424		LEWIS	THC	N/A	99213				
0425		LEWIS	THC	N/A	99213				
0426		LEWIS	THC	N/A	99213				
0427		LEWIS	THC	N/A	99213				
0428		LEWIS	THC	N/A	99213				
0429		LEWIS	THC	N/A	99213				
0430		LEWIS	THC	N/A	99213				
0431		LEWIS	THC	N/A	99213				
0432		LEWIS	THC	N/A	99213				
0433		LEWIS	THC	N/A	99213				
0434		LEWIS	THC	N/A	99213				
0435		LEWIS	THC	N/A	99213				
0436		LEWIS	THC	N/A	99213				
0437		LEWIS	THC	N/A	99203	99070	80101	V5869	
0438		LEWIS	THC	N/A	99203	99070	80101	V5869	
0439		LEWIS	THC	N/A	99213	80101	V5869		
0440		LEWIS	THC	N/A	99213				
0441		LEWIS	THC	N/A	99213				
0442		LEWIS	THC	N/A	77003	64483, 64484	j3301 (X2)		
0443		LEWIS	THC	N/A	50	64483, 64484	j3301		
0444		LEWIS	THC	N/A	77003	J3301	LUMBAR EPIDURAL W FLURO		
0445		LEWIS	THC	N/A	77003	76942	50	J3301 (X2)	20610, V5869
0446		LEWIS	THC	N/A	77003	64483, 64484	j3301		
0447		LEWIS	THC	N/A	77002	J3301	CEV/THOR EPRIDERAL WITH FLUROR		

0448		LEWIS	THC	N/A	64493,64494,64495	J3301		
0449		LEWIS	THC	N/A	77003	64635,64636 (X3)	J3301	
0450		LEWIS	THC	N/A	77003	64635,64636 (X3)	J3301	
0451		LEWIS	THC	N/A	77003	J3301	LUMBAR EPIDURAL W FLURO	
0452		LEWIS	THC	N/A	77002	50	20610	J3301 (X2)
0453		LEWIS	THC	N/A	64493,64494,64495	77003	50	J3301
0454		LEWIS	THC	N/A	77002	20610	J3301	
0455		LEWIS	THC	N/A	77003	64635,64636 (X2)	J3301	
0456		LEWIS	THC	N/A	77003	J3301	LUMBAR EPIDURAL W FLURO	
0457		LEWIS	THC	N/A	77003	64635,64636 (X2)	J3301	
0458		LEWIS	THC	N/A	77003	64635,64636 (X2)	J3301	
0459		LEWIS	THC	N/A	77002	J3301 (X2)	20610	
0460		LEWIS	THC	N/A	77002	20610	J3301	
0461		LEWIS	THC	N/A	77003	64635,64636 (X3)	J3301	
0462		LEWIS	THC	N/A	77003	64483, 64484	J3301	
0463		LEWIS	THC	N/A	77003	64635,64636 (X3)	J3301	
0464		LEWIS	THC	N/A	64493,64494,64495	77003		
0465		LEWIS	THC	N/A	64490,64491	77003	J3301	
0466		LEWIS	THC	N/A	27096	77003	50	J3301
0467		LEWIS	THC	N/A	27096 (X2)	50	J3301 (X2)	
0468		LEWIS	THC	N/A	77003	64483, 64484		
0469		LEWIS	THC	N/A	77003	J3301	CEV/THOR EPRIDERAL WITH FLUROR	
0470		LEWIS	THC	N/A	77003	J3301 (X2)	LUMBAR EPIDURAL W FLURO	
0471		LEWIS	THC	N/A	77003	J3301	LUMBAR EPIDURAL W FLURO	
0472		LEWIS	THC	N/A	77003	27096 (X2)	50	J3301
0473		LEWIS	THC	N/A	77003	64493,64494,64495	50	J3301
0474		LEWIS	THC	N/A	77003	27096 (X2)	50	J3301
0475		LEWIS	THC	N/A	77003	64635,64636 (X2)	J3301 (X2)	
0476		LEWIS	THC	N/A	77003	J3301 (X2)	LUMBAR EPIDURAL W FLURO	
0477		LEWIS	THC	N/A	77003	J3301	LUMBAR EPIDURAL W FLURO	
0478		LEWIS	THC	N/A	77003	27096 (X2)	50	J3301
0479		LEWIS	THC	N/A	77003	64635,64636 (X2)	J3301	
0480	01/19/17	LEWIS	THC	NES	77003	64483, 64484	J3301 (X2)	
0481	01/19/17	LEWIS	THC	NES	77002	50	20610	J3301
0482		LEWIS	THC	N/A	77003	64483, 64484	J3301 (X2)	
0483		LEWIS	THC	N/A	77003	64493,64494,64495	50	J3301
0484		LEWIS	THC	N/A	77003	J3301	LUMBAR EPIDURAL W FLURO	
0485		LEWIS	THC	N/A	64635,64636 (X2)	80101	V5869	
0486		LEWIS	THC	N/A	77003	64635,64636 (X3)	J3301	
0487		LEWIS	THC	N/A	77002	20610	J3301 (X2)	
0488		LEWIS	THC	N/A	64493,64494,64495	77003	50	
0489		LEWIS	THC	N/A	77003	50	64483	
0490		LEWIS	THC	N/A	27096 (X2)	77003	50	
0491		LEWIS	THC	N/A	77003	50	64483	J3301
0492		LEWIS	THC	N/A	99213	80101	V5869	
0493		LEWIS	THC	N/A	99213			
0494		LEWIS	THC	N/A	99213			
0495		LEWIS	THC	N/A	99213			
0496		LEWIS	THC	N/A	99213	80101	V5869	
0497		LEWIS	THC	N/A	99203	99070	80101	V5869
0498		LEWIS	THC	N/A	99213			
0499		LEWIS	THC	N/A	99213			
0500		LEWIS	THC	N/A	99214	80101	V5869	
0501		LEWIS	THC	N/A	99213			
0502		LEWIS	THC	N/A	99213			
0503		LEWIS	THC	N/A	99213			

0504	LEWIS	THC	N/A	99213	80101	V5869	
0505	LEWIS	THC	N/A	99213			
0506	LEWIS	THC	N/A	99213			
0507	LEWIS	THC	N/A	99213			
0508	LEWIS	THC	N/A	99203	80101	V5869	
0509	LEWIS	THC	N/A	99203	80101	V5869	
0510	LEWIS	THC	N/A	99213			
0511	LEWIS	THC	N/A	99213			
0512	LEWIS	THC	N/A	99213			
0513	LEWIS	THC	N/A	99213	80101	V5869	
0514	LEWIS	THC	N/A	99213			
0515	LEWIS	THC	N/A	99213			
0516	LEWIS	THC	N/A	99213			
0517	LEWIS	THC	N/A	99213			
0518	LEWIS	THC	N/A	99213			
0519	LEWIS	THC	N/A	99213	80101	V5869	
0520	LEWIS	THC	N/A	99213			
0521	LEWIS	THC	N/A	99213			
0522	LEWIS	THC	N/A	99203	99070	80101	V5869
0523	LEWIS	THC	N/A	99203	99070	80101	V5869
0524	LEWIS	THC	N/A	99203	99070	80101	V5869
0525	LEWIS	THC	N/A	99203	99070	80101	V5869
0526	LEWIS	THC	N/A	99213	80101	V5869	
0527	LEWIS	THC	N/A	99213			
0528	LEWIS	THC	N/A	99213			
0529	LEWIS	THC	N/A	99213			
0530	LEWIS	THC	N/A	99213			
0531	LEWIS	THC	N/A	99213			
0532	LEWIS	THC	N/A	99213			
0533	LEWIS	THC	N/A	99213			
0534	LEWIS	THC	N/A	99213			
0535	LEWIS	THC	N/A	99213			
0536	LEWIS	THC	N/A	99213			
0537	LEWIS	THC	N/A	99213			
0538	LEWIS	THC	N/A	99213			
0539	LEWIS	THC	N/A	99213			
0540	LEWIS	THC	N/A	99213			
0541	LEWIS	THC	N/A	99213			
0542	LEWIS	THC	N/A	99213	20605	j3301	
0543	LEWIS	THC	N/A	99213			
0544	LEWIS	THC	N/A	99213			
0545	LEWIS	THC	N/A	99213			
0546	LEWIS	THC	N/A	99213			
0547	LEWIS	THC	N/A	99213			
0548	LEWIS	THC	N/A	99213	80101	V5869	
0549	LEWIS	THC	N/A	99213	20551		
0550	LEWIS	THC	N/A	99213			
0551	LEWIS	THC	N/A	99213			
0552	LEWIS	THC	N/A	99213			
0553	LEWIS	THC	N/A	99213			
0554	LEWIS	THC	N/A	99213			
0555	LEWIS	THC	N/A	99213			
0556	LEWIS	THC	N/A	99213	80101	V5869	
0557	LEWIS	THC	N/A	99213	80101	V5869	
0558	LEWIS	THC	N/A	99213			
0559	LEWIS	THC	N/A	99213			

0560	LEWIS	THC	N/A	99213	80101	V5869			
0561	LEWIS	THC	N/A	99203	80101	V5869			
0562	LEWIS	THC	N/A	99203	99070				
0563	LEWIS	THC	N/A	99203	99070	80101	V5869		
0564	LEWIS	THC	N/A	99213	80101	V5869			
0565	LEWIS	THC	N/A	99213					
0566	LEWIS	THC	N/A	99213					
0567	LEWIS	THC	N/A	99213					
0568	LEWIS	THC	N/A	99213					
0569	LEWIS	THC	N/A	99213	80101	V5869			
0570	LEWIS	THC	N/A	99213					
0571	LEWIS	THC	N/A	99213	80101	V5869			
0572	LEWIS	THC	N/A	99213	80101	V5869			
0573	LEWIS	THC	N/A	99213					
0574	LEWIS	THC	N/A	99213					
0575	LEWIS	THC	N/A	99213					
0576	LEWIS	THC	N/A	99213					
0577	LEWIS	THC	N/A	99213					
0578	LEWIS	THC	N/A	99213	80101	V5869			
0579	LEWIS	THC	N/A	99213					
0580	LEWIS	ME	N/A	99203	L0650	L1833,L2397	80101	V5869	
0581	LEWIS	THC	N/A	99213	80101	V5869			
0582	LEWIS	THC	N/A	99203	99070	80101	V5869		
0583	LEWIS	THC	N/A	99213					
0584	LEWIS	THC	N/A	99213					
0585	LEWIS	THC	N/A	99203	99070	80101	V5869		
0586	LEWIS	THC	N/A	99203	99070	80101	V5869		
0587	LEWIS	THC	N/A	99213					
0588	LEWIS	THC	N/A	99203	99070	80101	V5869		
0589	LEWIS	THC	N/A	99213					
0590	LEWIS	THC	N/A	99213	80101	V5869			
0591	LEWIS	THC	N/A	99213					
0592	LEWIS	THC	N/A	99213					
0593	LEWIS	THC	N/A	99213					
0594	LEWIS	THC	N/A	99213					
0595	LEWIS	THC	N/A	99203	99070	80101	V5869		
0596	LEWIS	THC	N/A	99203	99070	80101	V5869		
0597	LEWIS	THC	N/A	99213					
0598	LEWIS	THC	N/A	99213					
0599	LEWIS	THC	N/A	99213					
0600	LEWIS	THC	N/A	99213	80101	V5869			
0601	LEWIS	THC	N/A	99213	80101	V5869			
0602	LEWIS	THC	N/A	99213					
0603	LEWIS	THC	N/A	99213					
0604	LEWIS	THC	N/A	99213	80101	V5869			
0605	LEWIS	THC	N/A	99213					
0606	LEWIS	THC	N/A	99203	99070	80101	V5869		
0607	LEWIS	THC	N/A	99213					
0608	LEWIS	THC	N/A	99214					
0609	LEWIS	THC	N/A	99203	99070	80101	V5869		
0610	LEWIS	THC	N/A	99203	99070	80101	V5869		
0611	LEWIS	THC	N/A	99203	99070	80101	V5869		
0612	LEWIS	THC	N/A	99213					
0613	LEWIS	THC	N/A	99203	80101	V5869			
0614	LEWIS	THC	N/A	99213					
0615	LEWIS	THC	N/A	99213					

0616		LEWIS	THC	N/A	99213				
0617		LEWIS	THC	N/A	99203	99070	80101	V5869	
0618		LEWIS	THC	N/A	99213	80101	V5869		
0619		LEWIS	THC	N/A	99213				
0620		LEWIS	THC	N/A	99213				
0621		LEWIS	THC	N/A	99213				
0622		LEWIS	THC	N/A	99213				
0623		LEWIS	THC	N/A	99213				
0624		LEWIS	THC	N/A	99213				
0625		LEWIS	THC	N/A	99213	80101	V5869		
0626		LEWIS	THC	N/A	99213				
0627		LEWIS	THC	N/A	99203	99070	80101	V5869	
0628		LEWIS	THC	N/A	99203	99070	80101	V5869	
0629		LEWIS	THC	N/A	99213				
0630		LEWIS	THC	N/A	99213				
0631		LEWIS	THC	N/A	99213				
0632		LEWIS	THC	N/A	99213				
0633		LEWIS	THC	N/A	99213				
0634		LEWIS	THC	N/A	99213				
0635		LEWIS	THC	N/A	99213				
0636		LEWIS	THC	N/A	99213				
0637		LEWIS	THC	N/A	99213				
0638		LEWIS	THC	N/A	99214	76942	50	20606	
0639		LEWIS	THC	N/A	99203	80101	V5869		
0640		LEWIS	THC	N/A	99203	99070	80101	V5869	
0641		LEWIS	THC	N/A	99203	99070	80101	V5869	
0642		LEWIS	THC	N/A	99213				
0643		LEWIS	THC	N/A	99213				
0644									
0645		**RUSSO BILLED UNDER BOTHRA DOCUMENTS**							
0646	8/29/16	RUSSO	ME	BOTHRA (NOT EXPLICIT)	99203	80101	V5869		
0647	8/31/16	RUSSO	ME	BOTHRA (NOT EXPLICIT)	99203	80101	V5869	99070	
0648		RUSSO	ME	BOTHRA (NOT EXPLICIT)	99203	80101	V5869		
0649		RUSSO	ME	BOTHRA (NOT EXPLICIT)	99203	80101	V5869	99070	
0650		RUSSO	ME	BOTHRA (NOT EXPLICIT)	01991				
0651		RUSSO	ME	BOTHRA (NOT EXPLICIT)	99213	80101	V5869		
0652		RUSSO	ME	BOTHRA (NOT EXPLICIT)	99203	80101	V5869		
0653		RUSSO	ME	BOTHRA (NOT EXPLICIT)	99203	80101	V5869		
0654		RUSSO	ME	BOTHRA (NOT EXPLICIT)	99213				
0655		RUSSO	ME	BOTHRA (NOT EXPLICIT)	99213				
0656		RUSSO	ME	BOTHRA (NOT EXPLICIT)	99213	80101	V5869		
0657		RUSSO	ME	BOTHRA (NOT EXPLICIT)	99213				
0658		RUSSO	ME	BOTHRA (NOT EXPLICIT)	62311	96365	J3301 (X2)	77003	
0659		RUSSO	ME	BOTHRA (NOT EXPLICIT)	99203	99070	80101	V5869	
0660		RUSSO	ME	BOTHRA (NOT EXPLICIT)	99203	L0650	99070	80101	V5869
0661		RUSSO	ME	BOTHRA (NOT EXPLICIT)	99203	L0650	99070	80101	V5869
0662		RUSSO	ME	BOTHRA (NOT EXPLICIT)	99203	L0650	99070	80101	V5869
0663		RUSSO	ME	BOTHRA (NOT EXPLICIT)	99213	L0650			
0664		RUSSO	ME	BOTHRA (NOT EXPLICIT)	99203	99070	80101	V5869	
0665		RUSSO	ME	BOTHRA (NOT EXPLICIT)	99203	25	99070	80101	V5869
0666		RUSSO	ME	BOTHRA (NOT EXPLICIT)	99203	99070	80101	V5869	
0667		RUSSO	ME	BOTHRA (NOT EXPLICIT)	99203	L0650	99070	80101	V5869
0668		RUSSO	ME	BOTHRA (NOT EXPLICIT)	99203	99070	80101	V5869	
0669		RUSSO	ME	BOTHRA (NOT EXPLICIT)	99213				
0670		RUSSO	ME	BOTHRA (NOT EXPLICIT)	99213				

0671		RUSSO	ME	BOTHRA (NOT EXPLICIT)	99213				
0672		RUSSO	ME	BOTHRA (NOT EXPLICIT)	99203	80101	V5869		
0673		RUSSO	ME	BOTHRA (NOT EXPLICIT)	99203	80101	V5869	99070	
0674		RUSSO	ME	BOTHRA (NOT EXPLICIT)	99203	80101	V5869		
0675		RUSSO	ME	BOTHRA (NOT EXPLICIT)	99203	99070	V5869	80101	
0676		RUSSO	ME	BOTHRA (NOT EXPLICIT)	99203	99070	80101	V5869	
0677		RUSSO	ME	BOTHRA (NOT EXPLICIT)	99203	99070	80101	V5869	
0678		RUSSO	ME	BOTHRA (NOT EXPLICIT)	99203	99070	80101	V5869	
0679		RUSSO	SOME DOCUMENT SHOWING BOTHRA'S BILLINGS						
0680		RUSSO	ME, D2	BOTHRA (NOT EXPLICIT)	01992				
0681		RUSSO	ME, D2	BOTHRA (NOT EXPLICIT)	01992				
0682	08/29/16	RUSSO	BCCOM	BOTHRA ?	62311	77003	J3301 (X2)		
0683	09/28/16	RUSSO	MD/BCCOM??	BOTHRA	99213	50	J3301	20611	
0684	07/12/16	RUSSO	BCCOM	EDU	01991				
0685	07/12/16	RUSSO	BCCOM	EDU	01991				
0686	07/12/16	RUSSO	BCCOM	EDU	01991				
0687	07/12/16	RUSSO	BCCOM	EDU	01992				
0688	07/12/16	RUSSO	BCCOM	EDU	01992				
0689	07/12/16	RUSSO	BCCOM	EDU	01992				
0690	07/19/16	RUSSO	BCCOM	EDU	01991				
0691	07/19/16	RUSSO	BCCOM	EDU	01991				
0692	07/19/16	RUSSO	BCCOM	EDU	01991				
0693	07/19/16	RUSSO	BCCOM	EDU	01991				
0694	07/12/16	RUSSO	BCCOM	EDU	01991				
0695	07/07/16	RUSSO	BCCOM	EDU	01991				
0696	07/05/16	RUSSO	BCCOM	EDU	01991				
0697	07/05/16	RUSSO	BCCOM	EDU	01991				
0698	07/05/16	RUSSO	BCCOM	EDU	01991				
0699	07/05/16	RUSSO	BCCOM	EDU	01991				
0700	07/05/16	RUSSO	BCCOM	EDU	01991				
0701	06/30/16	RUSSO	BCCOM	EDU	01991				
0702	06/30/16	RUSSO	BCCOM	EDU	01991				
0703	06/30/16	RUSSO	BCCOM	EDU	01991				
0704	06/30/16	RUSSO	BCCOM	EDU	01991				
0705	06/30/16	RUSSO	BCCOM	EDU	01991				
0706	06/30/16	RUSSO	BCCOM	EDU	01992				
0707	06/30/16	RUSSO	BCCOM	EDU	01992				
0708	06/30/16	RUSSO	BCCOM	EDU	01992				
0709	06/23/16	RUSSO	BCCOM	EDU	01991				
0710	06/11/16	RUSSO	BCCOM	EDU	01991				
0711	06/11/16	RUSSO	BCCOM	EDU	01992				
0712	06/11/16	RUSSO	BCCOM	EDU	01992				
0713	06/11/16	RUSSO	BCCOM	EDU	01991				
0714	06/11/16	RUSSO	BCCOM	EDU	01992				
0715	06/09/16	RUSSO	BCCOM	EDU	01991				
0716	09/14/16	RUSSO	BCCOM/MD?	BOTHRA??	99213				
0717	07/06/16	RUSSO	BCCOM	BOTHRA	01991				
0718	07/06/16	RUSSO	BCCOM	BOTHRA	01992				
0719	07/06/16	RUSSO	BCCOM	BOTHRA	01992				
0720	07/06/16	RUSSO	BCCOM	BOTHRA	01991				
0721	07/06/16	RUSSO	BCCOM	BOTHRA	01992				
0722	07/06/16	RUSSO	BCCOM	BOTHRA	01992				
0723	07/13/16	RUSSO	BCCOM	BOTHRA	01992				
0724	07/28/16	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	62311	77003	96365	J3301	
0725	07/28/16	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	62310	96365	64635,64636 (X2)	J3301	
0726		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	62311	77003	96365	J3301	62273

0727		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	77003	01992,96365	64635,64636 (X2)	J3301		
0728		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	62311	77003	96365	J3301		
0729		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	77003	64635,64636 (X2)	J3301			
0730		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	50	77003	96365	64483		
0731		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	77003	64635,64636 (X2)	J3301	J3301		
0732		RUSSO	BCCOM, MD	BOTHRA (NOT EXPLICIT)	77003	64635,64636 (X2)	J3301			
0733		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	77003	64635,64636 (X1)	J3301			
0734		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	62311	77003	96365	J3301		
0735		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	62311	77003	96365	J3301		
0736		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	77003	96365	64635,64636 (X2)	J3301		
0737		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	62310	77003	96365	J3301 (X2)		
0738		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	62311	77003	96365	J3301 (X2)	80101,V5869	
0739		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	77003	96365				
0740	07/13/16	RUSSO	BCCOM	BOTHRA	01991					
0741	07/13/16	RUSSO	BCCOM	BOTHRA	01992					
0742	07/13/16	RUSSO	BCCOM, MD	BOTHRA	01992					
0743	07/13/16	RUSSO	BCCOM	BOTHRA	01991					
0744	07/13/16	RUSSO	BCCOM	BOTHRA	01992					
0745	07/13/16	RUSSO	BCCOM	BOTHRA	01991					
0746	07/13/16	RUSSO	BCCOM	BOTHRA	01992					
0747	07/13/16	RUSSO	BCCOM	BOTHRA	01992					
0748	07/13/16	RUSSO	BCCOM	BOTHRA	01991					
0749	07/13/16	RUSSO	BCCOM	BOTHRA	01992					
0750	07/13/16	RUSSO	BCCOM	BOTHRA	01992					
0751	07/16/16	RUSSO	BCCOM	BOTHRA	01992					
0752	07/16/16	RUSSO	BCCOM	BOTHRA	01992					
0753	07/16/16	RUSSO	BCCOM	BOTHRA	01991					
0754	07/09/16	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	64635,64636 (X2)	80101	V5869			
0755	06/14/16	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	62311	J1100	80101	V5869		
0756		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213					
0757		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213					
0758		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	62311	77003	J3301			
0759		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	64634,64633 (X2)	J3301				
0760		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	64493,64494,64495	50	J3301	80101	V5869	
0761		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	77003	64635,64636 (X2)	J3301			
0762		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	77003	64635,64636 (X3)	J3301			
0763		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	77003	64635,64636 (X2)	J3301			
0764		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	77003	64635,64636 (X2)	J3301	80101	V5869	
0765		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	77003	64483,64484	J3301			
0766		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	77003	64483,64484 (X2)	J3301			
0767		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	62310	77003	J3301			
0768		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	77003	64483 (X2)	J3301			
0769		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	62311	77003	J3301(X2)			
0770		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	64490,64491,64492	50	77003	J3301		
0771		RUSSO	N/A	BOTHRA (NOT EXPLICIT)	77003	64635,64636 (X2)	J3301(X2)			
0772		RUSSO	N/A	BOTHRA (NOT EXPLICIT)	99203	99070	80101	V5869		
0773	09/28/16	RUSSO	MD	BOTHRA	99213	50	J3301	20611		
0774		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	62311	77003	J3301(X2)			
0775		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	62311	77003	J3301			
0776		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	77003	64633,64634 (X2)	J3301			
0777		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	64493,64494,64495	50	J3301(X2)			
0778		RUSSO	BCCOM,MD	BOTHRA (NOT EXPLICIT)	64493,64494,64495	77003	50	J3301		
0779		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	62310	77003	J3301(X2)			
0780		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	64630	50	J3301(X2)			
0781		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	50	64483	J3301			
0782		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	62311	77003	J3301(X2)			

0783	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	77003	50	64483	J3301 (X2)		
0784	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	62311	77003	J3301(X2)			
0785	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	77003	64633,64634 (X3)	J3301			
0786	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	64493,64494,64495	50	J3301			
0787	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	62311	77003	J3301			
0788	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	62311	77003	J3301			
0789	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	64493,64494,64495	J3301	77003			
0790	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	62310	77003	J3301(X2)			
0791	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	62311	J3301	77003			
0792	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	77003	64635,64636 (X2)	J3301			
0793	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	77003	64633,64634 (X2)	J3301			
0794	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	62311	77003	J3301			
0795	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	64493,64494,64495	77003	50	J3301		
0796	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	77003	64635,64636 (X2)	J3301			
0797	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	77003	64635,64636 (X3)	J3301			
0798	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	64421	77003	J3301(X2)			
0799	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	77003	64635,64636 (X3)	J3301			
0800	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	62311	77003	J3301(X2)			
0801	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213	62310	J1100	80101	V5869	
0802	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	62311	J3301	77003			
0803	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	62311	77003	J3301			
0804	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	77003	64635,64636 (X2)	J3301			
0805	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	77003	64635,64636 (X2)	J3301			
0806	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	96365	77003	64483	J3301 (X2)		
0807	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	62311	96365	J3301	77003		
0808	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	64493,64494,64495	77003	50	96365	J3301	
0809	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	62311	77003	96365	J3301 (X2)		
0810	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	62311	77003	96365	J3301		
0811	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	77003	96365	J3301	62310		
0812	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	62311	96365	77003	J3301		
0813	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	64421	77003	96365	J3301		
0814	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	50	96365	64483	J3301 (X2)		
0815	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	96365	64635,64636 (X2)	J3301			
0816	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	64493,64494,64495	50	96365	J3301		
0817	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	62311	96365	J3301	77003		
0818	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	77003	96365	64635,64636 (X2)	J3301		
0819	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	64493,64494,64495	50	96365			
0820	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	62310	96365	J3301(X2)	77003		
0821	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	77003	96365	64635,64636 (X2)	J3301		
0822	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	77003	50	96365	64483	J3301	
0823	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	62311	77003	96365	J3301	80101,V5869	
0824	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	62311	96365	J3301(X2)			
0825	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	64421	96365	77003	J3301		
0826	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	77003	50	96365	64483	J3301 (X2)	
0827	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	64493,64494,64495	50	96365	J3301		
0828	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	62310	96365	J3301	77003		
0829	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	62310	96365	77003	J3301		
0830	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	96365	64635,64636 (X2)	J3301			
0831	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	96365	77003	64635,64636 (X2)	J3301		
0832	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	62311	96365	J3301	77003		
0833	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	62311	77003	96365	J3301		
0834	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	64493,64494,64495	96365	50	77003	J3301	
0835	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	62310	77003	96365	J3301		
0836	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	62311	77003	01992	J3301		
0837	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	62310	77003	96365	J3301 (X2)		
0838	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	27093	77003	J3301			

0839		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	62310	77003	96365	J3301		
0840		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	64493,64494,64495	77003	50	96365	J3301	
0841		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	27096	50	96365	J3301		
0842		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	62310	77003	96365	J3301		
0843		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	62310	77003	96365	J3301 (X2)		
0844		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	77003	96365	64483	J3301 (X2)		
0845		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	62311	77003	96365	J3301 (X2)		
0846		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	77003	96365	64483,64484	J3301 (X2)		
0847		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	77003	64483,64484	J3301(X2)			
0848		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	64493,64494,64495	96365	J3301	77003		
0849		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	77003	96365	64483,64484 (x2)	J3301 (X2)		
0850		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	62311	77003	96365	J3301	80101,V5869	
0851		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	62310	96365	77003	J3301		
0852		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	77003	50	96365	64483	J3301 (X2)	
0853		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	64400	77002	96365	J3301		
0854		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	62311	77003	96365	J3301		
0855		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	77003	50	96365	64483	J3301	
0856		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	62310	77003	96365	J3301 (X2)		
0857		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	27096	77003	50	96365	J3301	
0858		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	27096	77003	50	96365	J3301	
0859		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	62311	96365	J3301			
0860		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	77003	50	96365	64483	J3301 (X2)	
0861		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	62311	77003	96365	J3301		
0862		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	27093	96365	J3301			
0863		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213	50	J3301			
0864		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	20610	77002	J3301			
0865		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	62311	J3301				
0866		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	77003	64483,64484 (x2)	J3301			
0867		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	62311	77003	J3301			
0868		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	77003	64483,64484	J3301(X2)			
0869		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	62310	77003	96365	J3301	80101,V5869	
0870		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213					
0871		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213					
0872		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99203	80101	v5869			
0873	07/06/16	RUSSO	BCCOM	BOTHRA	01992					
0874		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	77003	96365	64635,64636 (X2)	J3301		
0875		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	62311	77003	J3301			
0876		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213	80101	v5869			
0877		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	77003	96365	64483,64484	J3301		
0878	06/11/16	RUSSO	BCCOM	EDU	01991					
0879		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	62310	96365	77003	J3301		
0880		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	62310	77003	96365	J3301 (X2)		
0881		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	62311	77003	96365	J3301		
0882		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	77003	50	96365	64483	J3301 (X2)	
0883		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	77003	96365	64635,64636 (X2)	J3301		
0884		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	27096	77003	50	96365	J3301	
0885		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	62310	96365	77003	J3301		
0886		RUSSO	ME	BOTHRA (NOT EXPLICIT)	99213	20611	J3301	80101	V5869	
0887		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	64490,64491,64492	77003	50	96365	J3301	
0888		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	62310	77003	96365	J3301		
0889		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	62310	77003	96365	J3301		
0890		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	62311	77003	96365	J3301	80101,V5869	
0891		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	64490,64491,64492	77003	50	96365	J3301	
0892		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	77003	96365	64635,64636 (X2)	J3301		
0893		RUSSO	ME	BOTHRA (NOT EXPLICIT)	99213					
0894		RUSSO	ME	BOTHRA (NOT EXPLICIT)	99203	99070	80101	V5869		

0895	RUSSO	ME	BOTHRA (NOT EXPLICIT)	99203	99070	80101	V5869	
0896	RUSSO	ME	BOTHRA (NOT EXPLICIT)	99213				
0897	RUSSO	ME	BOTHRA (NOT EXPLICIT)	99203	99070	80101	V5869	
0898	RUSSO	ME	BOTHRA (NOT EXPLICIT)	99203	99070	80101	V5869	
0899	RUSSO	ME	BOTHRA (NOT EXPLICIT)	99213	L0650			
0900	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213	J3301	20552	80101	V5869
0901	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213				
0902	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213	80101	v5869		
0903	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213				
0904	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213	80101	v5869		
0905	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213	80101	v5869		
0906	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213	80101	v5869		
0907	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213				
0908	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213	80101	v5869		
0909	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213				
0910	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99203	99070	80101	V5869	
0911	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213	80101	v5869		
0912	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213				
0913	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213				
0914	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213				
0915	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213	80101	v5869		
0916	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213				
0917	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213				
0918	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99203	80101	v5869		
0919	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99203	80101	v5869		
0920	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99203	99070	80101	V5869	
0921	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213	80101	v5869		
0922	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213	80101	v5869		
0923	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213	80101	v5869		
0924	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213				
0925	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213				
0926	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213				
0927	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213				
0928	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213				
0929	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213				
0930	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213				
0931	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213				
0932	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99023	80101	v5869		
0933	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99203	99070	80101	V5869	
0934	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99203	80101	v5869		
0935	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99203	99070	80101	V5869	
0936	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213				
0937	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213	80101	v5869		
0938	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213	80101	v5869		
0939	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213	80101	v5869		
0940	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213				
0941	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213				
0942	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213				
0943	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213				
0944	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213				
0945	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213	80101	v5869		
0946	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213	80101	v5869		
0947	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213				
0948	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213	J1885			
0949	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99203	80101	v5869		
0950	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213				

0951		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99203	99070	80101	V5869		
0952		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213					
0953		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213					
0954		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213	J3301	20611			
0955		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213					
0956		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213					
0957		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213					
0958		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99203	80101	v5869			
0959		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99203	80101	v5869			
0960		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99203	99070	80101	V5869		
0961		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213	80101	v5869			
0962		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213					
0963		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213	J3301	20611			
0964		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213	80101	v5869			
0965		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213					
0966		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213					
0967		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213					
0968		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99203	80101	v5869			
0969		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213					
0970		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213					
0971		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213	20611	50	J7321		
0972		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213	80101	v5869			
0973		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213	80101	v5869			
0974		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213					
0975		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213					
0976		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99212	80101	v5869			
0977		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213					
0978		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213	80101	v5869			
0979		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213					
0980		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213					
0981		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213	25	J1100	20611	80101,V5869	
0982		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213	80101	v5869			
0983		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213					
0984		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213					
0985		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213					
0986		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99203	99070	80101	V5869		
0987		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213					
0988		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213	80101	v5869			
0989		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213	80101	v5869	20611		
0990		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99203	99070	80101	V5869		
0991		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99203	99070	80101	V5869		
0992		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99203	99070	80101	V5869		
0993		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99203	99070	80101	V5869		
0994		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213					
0995		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213	80101	v5869			
0996		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99212					
0997		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213					
0998		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99203	99070	80101	V5869		
0999		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213	80101	v5869			
1000		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213	J3301	20611	80101	v5869	
1001		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99203	80101	v5869			
1002		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99203	J3301	20611	80101	v5869	
1003		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213					
1004	09/12/16	RUSSO	BCCOM	BOTHRA	99203	99070	80101	V5869		
1005		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99203	99070	80101	V5869		
1006		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213	J3301	20611			

1007	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213	80101	v5869			
1008	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213	80101	v5869			
1009	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213	80101	v5869			
1010	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213	80101	v5869			
1011	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213					
1012	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213					
1013	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213	J3301				
1014	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213					
1015	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213	80101	v5869			
1016	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99203	99070	80101	V5869		
1017	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213	80101	v5869			
1018	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213					
1019	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213	80101	v5869			
1020	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213					
1021	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213					
1022	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213	V5869	80101			
1023	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213					
1024	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213	80101	v5869			
1025	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213					
1026	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213					
1027	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213	80101	v5869			
1028	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213					
1029	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213					
1030	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213	80101	v5869			
1031	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213					
1032	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213					
1033	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213					
1034	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213	80101	v5869			
1035	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213	80101	v5869			
1036	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213	J3301	80101	J3301	27093	
1037	RUSSO	BCCOM/MD?	BOTHRA (NOT EXPLICIT)	99213	80101	v5869			
1038	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213					
1039	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213					
1040	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213	80101	v5869			
1041	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213					
1042	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	96265	J3301	77002	20611		
1043	KUFNER	BCCOM	BOTHRA (NOT EXPLICIT)	01992					
1044	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213	80101	v5869			
1045	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213					
1046	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213					
1047	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99203	80101	v5869			
1048	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99203	99070	80101	V5869		
1049	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213	80101	v5869			
1050	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213					
1051	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213					
1052	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213	50	J3301	20611		
1053	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213					
1054	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213					
1055	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213	80101	v5869			
1056	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99203	80101	v5869			
1057	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213					
1058	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213	80101	v5869			
1059	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213	80101	v5869			
1060	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213	80101	v5869			
1061	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213	80101	v5869			
1062	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	64406	J3301				

1063	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213				
1064	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213	J1100	80101	V5869	20611
1065	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213	20611	J3301	G0431	v5869
1066	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213	80101	v5869		
1067	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213				
1068	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213	80101	v5869		
1069	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213				
1070	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213	50	J3301	20611	
1071	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213	80101	v5869		
1072	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213				
1073	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213				
1074	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213	80101	v5869		
1075	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213				
1076	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213				
1077	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213	80101	v5869		
1078	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213				
1079	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99203	99070	80101	V5869	
1080	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213	80101	v5869		
1081	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99203	99070	80101	V5869	
1082	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213				
1083	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213				
1084	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213				
1085	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213	80101	v5869		
1086	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213				
1087	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213				
1088	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213				
1089	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213				
1090	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213	64405	50	J3301	
1091	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213				
1092	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213				
1093	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213				
1094	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213				
1095	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213	80101	v5869		
1096	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213	80101	v5869		
1097	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213	80101	v5869		
1098	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99203	99070	80101		
1099	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213				
1100	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213	80101	v5869		
1101	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213				
1102	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213				
1103	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213	80101	v5869		
1104	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213	80101	v5869		
1105	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213				
1106	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99203	99070	v5869		
1107	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99203	99070	80101	V5869	
1108	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99203	99070	80101	V5869	
1109	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213	80101	v5869	20611	
1110	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213				
1111	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99203	J7321	20611		
1112	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213				
1113	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213				
1114	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213				
1115	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99203	99070	80101	V5869	
1116	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99203	80101	v5869		
1117	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213	80101	v5869		
1118	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213				

1119	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213					
1120	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213					
1121	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213	80101	v5869			
1122	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213					
1123	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213					
1124	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213					
1125	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213					
1126	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213					
1127	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213					
1128	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213					
1129	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213	80101	v5869			
1130	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213					
1131	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213					
1132	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213					
1133	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99203	99070	80101	V5869		
1134	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213					
1135	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213					
1136	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213	J3301	20611			
1137	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213	80101	v5869			
1138	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213					
1139	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213	80101	v5869			
1140	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213					
1141	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213	80101	v5869			
1142	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99203					
1143	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99203	99070	80101	V5869		
1144	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99203	99070	80101	V5869		
1145	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213	J3301	20552			
1146	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213	J3301	20611			
1147	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213					
1148	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99203					
1149	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213					
1150	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213	80101	v5869			
1151	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99203	99070				
1152	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99203	J3301	99070	80101, V5869	20611	
1153	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99203	99070	80101	V5869		
1154	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99203	99070	80101	V5869		
1155	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99203	80101	v5869			
1156	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213	J3301	J1885	20611		
1157	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213					
1158	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213	64450	J3301			
1159	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213					
1160	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213	J3301	80101	20611		
1161	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213					
1162	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99203	J3301	99070	20611	80107,V5869	
1163	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99203	80101	v5869			
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1165	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99203	80101	v5869			
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1167	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99203	99070	80101	V5869		
1168	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99203	99070	80101	V5869		
1169	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99203	80101	v5869			
1170	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213	80101	v5869			
1171	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213	80101	v5869			
1172	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213	80101	v5869			
1173	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213	80101	v5869			
1174	RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213					

1175		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213	J3301	80101	V5869	20611
1176		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213				
1177		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99203	99070	80101	V5869	
1178		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213				
1179		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213	80101	v5869		
1180		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213				
1181		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213				
1182		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213				
1183		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213	80101	J1885	V5869	
1184		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213				
1185		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213				
1186		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213	80101	v5869		
1187		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213	80101	v5869		
1188		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213				
1189		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213	80101	v5869		
1190		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99203	99070	80101	V5869	
1191		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99203	99070	80101	V5869	
1192		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213	80101	v5869		
1193		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99203	99070	80101	V5869	
1194		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213				
1195		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213	J3301	20526	80101, V5869	
1196		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213				
1197		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213				
1198		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213	80101	v5869		
1199		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213				
1200		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213				
1201		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213				
1202		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213	80101	v5869		
1203		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213				
1204		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213				
1205		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213				
1206		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213	80101	v5869		
1207		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99203	99070	80101	V5869	
1208		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99203	99070	80101		
1209		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99203	99070	80101	V5869	
1210		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99203	99070	80101	V5869	
1211		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213				
1212		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99203				
1213	A sheet documenting Bothra billing THC (RUSSO)								
1214									
1215		RUSSO	BCCOM	BOTHRA (NOT EXPLICIT)	99213				
1216		RUSSO	THC	BOTHRA (NOT EXPLICIT)	77003	64635,64636 (X2)	J3301		
1217		RUSSO	THC	BOTHRA (NOT EXPLICIT)	64493,64494,64495	77003	50	J3301	
1218		RUSSO	THC	BOTHRA (NOT EXPLICIT)	64493,64494,64495	50	77002	80101, V5869	
1219		RUSSO	THC	BOTHRA (NOT EXPLICIT)	62310	77003	J3301		
1220		RUSSO	THC	BOTHRA (NOT EXPLICIT)	77003	64635,64636 (X3)	J3301		
1221		RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	20611	J3301	80101, V5869	
1222		RUSSO	THC	BOTHRA (NOT EXPLICIT)	99203	99070	80101	V5869	
1223		RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	J3301	20611		
1224		RUSSO	THC	BOTHRA (NOT EXPLICIT)	27096	77003	50	J3301	
1225		RUSSO	THC	BOTHRA (NOT EXPLICIT)	62311	J3301	77003		
1226		RUSSO	THC	BOTHRA (NOT EXPLICIT)	62311	77003	J3301 (X2)		
1227		RUSSO	THC	BOTHRA (NOT EXPLICIT)	77003	50	64483	J3301 (X2)	
1228		RUSSO	THC	BOTHRA (NOT EXPLICIT)	77003	50	64483	J3301	80101,V5869
1229		RUSSO	THC	BOTHRA (NOT EXPLICIT)	62311	77003	J3301	80101, V5869	
1230		RUSSO	THC	BOTHRA (NOT EXPLICIT)	62311	77003	J3301		

1231	RUSSO	THC	BOTHRA (NOT EXPLICIT)	62310	77003	J3301		
1232	RUSSO	THC	BOTHRA (NOT EXPLICIT)	62310	77003	J3301		
1233	RUSSO	THC	BOTHRA (NOT EXPLICIT)	62310	77003	J3301		
1234	RUSSO	THC	BOTHRA (NOT EXPLICIT)	62311	77003	J3301	80101, V5869	
1235	RUSSO	THC	BOTHRA (NOT EXPLICIT)	64493,64494,64495	77003	50	J3301	
1236	RUSSO	THC	BOTHRA (NOT EXPLICIT)	64493,64494,64495	99213	77003	J3301	
1237	RUSSO	THC	BOTHRA (NOT EXPLICIT)	62311	77003	J3301		
1238	RUSSO	THC	BOTHRA (NOT EXPLICIT)	62310	77003	J3301	80101, V5869	
1239	RUSSO	THC	BOTHRA (NOT EXPLICIT)	62310	77003	J3301 (X2)		
1240	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				
1241	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				
1242	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				
1243	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	J7321	20611		
1244	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				
1245	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	50	J3301	20611	
1246	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99203	99070	80101	V5869	
1247	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				
1248	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				
1249	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				
1250	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	80101	v5869		
1251	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				
1252	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				
1253	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				
1254	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	L0650			
1255	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	J3301	20611		
1256	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				
1257	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	80101	v5869		
1258	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				
1259	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				
1260	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	80101	v5869		
1261	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	80101	v5869		
1262	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	80101	v5869		
1263	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				
1264	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	80101	v5869		
1265	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				
1266	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	80101	v5869		
1267	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99203	99070	v5869		
1268	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				
1269	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	80101	v5869		
1270	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	80101	v5869		
1271	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				
1272	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				
1273	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				
1274	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				
1275	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				
1276	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				
1277	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				
1278	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				
1279	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				
1280	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				
1281	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				
1282	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				
1283	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				
1284	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	80101	v5869		
1285	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				
1286	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				

1287	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	80101	v5869			
1288	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213					
1289	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213					
1290	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213					
1291	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	80101	v5869			
1292	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	20600(X2)	50	J3301		
1293	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	20611	J3301	80101, V5869		
1294	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	80101	v5869			
1295	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213					
1296	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213					
1297	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	80101	v5869			
1298	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213					
1299	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	80101	v5869			
1300	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213					
1301	RUSSO	THC/MD	BOTHRA (NOT EXPLICIT)	99213					
1302	RUSSO	THC	BOTHRA (NOT EXPLICIT)	01991					
1303	RUSSO	THC	BOTHRA (NOT EXPLICIT)	01992					
1304	RUSSO	THC	BOTHRA (NOT EXPLICIT)	01991					
1305	RUSSO	THC	BOTHRA (NOT EXPLICIT)	01992					
1306	RUSSO	THC	BOTHRA (NOT EXPLICIT)	01992					
1307	RUSSO	THC	BOTHRA (NOT EXPLICIT)	01992					
1308	RUSSO	THC	BOTHRA (NOT EXPLICIT)	01992					
1309	RUSSO	THC	BOTHRA (NOT EXPLICIT)	01992					
1310	RUSSO	THC	BOTHRA (NOT EXPLICIT)	01992					
1311	RUSSO	THC	BOTHRA (NOT EXPLICIT)	01992					
1312	RUSSO	THC	BOTHRA (NOT EXPLICIT)	01992					
1313	RUSSO	THC	BOTHRA (NOT EXPLICIT)	01991					
1314	RUSSO	THC	BOTHRA (NOT EXPLICIT)	01992					
1315	RUSSO	THC	BOTHRA (NOT EXPLICIT)	64493,64494,64495(X2)		77003	J3301		
1316	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213					
1317	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213					
1318	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213					
1319	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213					
1320	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213					
1321	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	J3301	20611			
1322	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	80101	v5869			
1323	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213					
1324	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213					
1325	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	J3301	20552			
1326	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99203	20611	J3301 (X2)	80101, V5869	99070	
1327	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213					
1328	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213					
1329	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213					
1330	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213					
1331	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213					
1332	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213					
1333	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213					
1334	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	J3301	20552			
1335	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213					
1336	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	20611	J3301	80101, V5869		
1337	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213					
1338	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213					
1339	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213					
1340	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213					
1341	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213					
1342	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	80101	v5869			

1343	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	J3301	20611			
1344	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213					
1345	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213					
1346	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213					
1347	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213					
1348	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213		80101	V5869		
1349	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99203	99070	80101	V5869		
1350	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99203	80101	v5869			
1351	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213					
1352	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213					
1353	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213					
1354	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	80101	v5869			
1355	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213					
1356	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	50	20611	J7231 (X2)	80101,V5869	
1357	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213					
1358	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213					
1359	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213					
1360	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213					
1361	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213					
1362	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	J3301	20611			
1363	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	G0431	v5869			
1364	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	J7231	20611			
1365	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213					
1366	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	20611(X2)	J7321			
1367	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	80101	v5869			
1368	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213					
1369	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213					
1370	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	J3301	20611			
1371	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	80101	v5869			
1372	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	80101	v5869			
1373	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213					
1374	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213					
1375	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	80101	v5869			
1376	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213					
1377	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	80101	V5869			
1378	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99203	80101	v5869			
1379	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99203	99070	80101	V5869		
1380	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	80101	v5869			
1381	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	J3301	2061			
1382	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213					
1383	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213					
1384	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213					
1385	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99203	99070	80101	V5869		
1386	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213					
1387	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213					
1388	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213					
1389	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213					
1390	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213					
1391	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	20611	J3301			
1392	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213					
1393	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213					
1394	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	J3301	80101	V5869	20611	
1395	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	80101	v5869			
1396	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213					
1397	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	80101	v5869			
1398	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	80101	v5869			

1399	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213			
1400	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	80101	v5869	
1401	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	80101	v5869	
1402	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99203	99070	80101	V5869
1403	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213			
1404	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213			
1405	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213			
1406	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	J3301	20611	
1407	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213			
1408	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	80101	v5869	
1409	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	99070	80101	V5869
1410	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213			
1411	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99203	99070	80101	V5869
1412	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99203	99070	80101	V5869
1413	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	80101	v5869	
1414	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213			
1415	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213			
1416	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213			
1417	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	20552	J3301	
1418	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	20611	J3301	80101, V5869
1419	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99203	80101	v5869	
1420	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99203	99070	80101	V5869
1421	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213			
1422	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213			
1423	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213			
1424	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	80101	v5869	
1425	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	80101	v5869	
1426	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	80101	V5869	
1427	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213			
1428	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213			
1429	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	80101	v5869	
1430	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213			
1431	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213			
1432	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	j1885	80101	V5869
1433	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	j1885	80101	V5869
1434	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	80101	v5869	
1435	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	25		
1436	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	20611	J3301	80101, V5869
1437	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	80101	v5869	
1438	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	80101		
1439	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213			
1440	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	80101	v5869	
1441	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99203	80101	v5869	
1442	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213			
1443	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213			
1444	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213			
1445	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	20611	J3301	
1446	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	80101	v5869	
1447	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213			
1448	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213			
1449	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213			
1450	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213			
1451	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213			
1452	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213			
1453	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	80101	v5869	
1454	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	80101	v5869	

1455	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	80101	v5869		
1456	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99203	99070	80101	V5869	
1457	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				
1458	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				
1459	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				
1460	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				
1461	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				
1462	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				
1463	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				
1464	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99203	99070	80101	V5869	
1465	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				
1466	RUSSO	THC	BOTHRA (NOT EXPLICIT)	76942	50	20526 (x2)	J3301 (X2)	
1467	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99203	99070	80101	V5869	
1468	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99203	99070	80101	V5869	
1469	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				
1470	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	80101	v5869		
1471	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	80101	v5869		
1472	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	80101	v5869		
1473	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	80101	v5869		
1474	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				
1475	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	80101	v5869		
1476	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	20611(X2)	j7321 (X2)		
1477	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	80101	v5869		
1478	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				
1479	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				
1480	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99203	99070	80101	v5869	
1481	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				
1482	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				
1483	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				
1484	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	80101	v5869		
1485	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	80101	v5869		
1486	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				
1487	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				
1488	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				
1489	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	80101	v5869		
1490	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99203	99070	80101	V5869	
1491	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	J7321	20611	80101, V5869	20611
1492	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99203	99070	80101	V5869	
1493	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				
1494	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	80101	v5869		
1495	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				
1496	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				
1497	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				
1498	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				
1499	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				
1500	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				
1501	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99203	99070	80101	V5869	
1502	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99203	99070	80101	V5869	
1503	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				
1504	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				
1505	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	J3301	20611 (X2)		
1506	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				
1507	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				
1508	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	80101	v5869		
1509	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	80101	v5869		
1510	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				

1511	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99203	99070	80101	V5869		
1512	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	80101	v5869			
1513	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213					
1514	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99203					
1515	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213					
1516	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	80101	v5869			
1517	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99203	99070	80101	V5869		
1518	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213					
1519	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213					
1520	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99203	J3301	20550	80101, V5869		
1521	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213					
1522	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	20600	J3301	80101, V5869		
1523	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99203	J3301	20611	L1833,L2397	99070	
1524	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99214	20611	J3301	99070	80101,V5869	
1525	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213					
1526	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	80101	v5869			
1527	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	80101	v5869			
1528	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213					
1529	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	27093	J1030			
1530	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213					
1531	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213					
1532	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	80101	v5869			
1533	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213					
1534	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99203	99070	80101	V5869		
1535	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	80101	v5869			
1536	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213					
1537	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213					
1538	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213					
1539	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213					
1540	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213					
1541	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	80101	v5869			
1542	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	80101	v5869			
1543	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213					
1544	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	80101	v5869			
1545	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	80101	v5869			
1546	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213					
1547	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99203	80101	v5869			
1548	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213					
1549	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213					
1550	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213					
1551	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213					
1552	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	80101	v5869			
1553	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	80101	v5869			
1554	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213					
1555	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213					
1556	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213					
1557	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	80101	v5869			
1558	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	J3301	20611	80101, V5869		
1559	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213					
1560	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	80101	v5869			
1561	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213					
1562	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99203	99070	80101	V5869		
1563	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	80101	v5869			
1564	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	80101	v5869			
1565	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213					
1566	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213					

1567	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				
1568	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				
1569	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				
1570	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99203	20611	80101	V5869	
1571	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99203	99070	80101	V5869	
1572	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				
1573	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	80101	v5869		
1574	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	J3301	20611	80101, V5869	
1575	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	J7321	20611		
1576	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				
1577	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	80101	v5869		
1578	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				
1579	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99203	99070	80101	V5869	
1580	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				
1581	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				
1582	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99203	99070	80101	V5869	
1583	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				
1584	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	80101	v5869		
1585	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	50	20611	J3301	80101,V5869
1586	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				
1587	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				
1588	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				
1589	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	J1885			
1590	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	64405			
1591	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99203	99070	80101	V5869	
1592	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99203	80101	v5869		
1593	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99203	99070	80101	V5869	
1594	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				
1595	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	80101	v5869		
1596	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	80101	v5869		
1597	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				
1598	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	J3301	20611		
1599	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	80101	v5869		
1600	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				
1601	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	80101	v5869		
1602	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	80101	v5869		
1603	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99203	99070	80101	V5869	
1604	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99203	99070	80101	V5869	
1605	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				
1606	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				
1607	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				
1608	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				
1609	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	20611	80101	V5869	
1610	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	J1885	80101	V5869	
1611	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99203	99070	80101	V5869	
1612	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99203	J1885	99070	80101, V5869	
1613	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99203	20611	J3301	99070,80101,V5869	
1614	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	J1885			
1615	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				
1616	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	J3301	20611	80101, V5869	
1617	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	80101	v5869		
1618	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				
1619	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	80101	v5869		
1620	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				
1621	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	80101	v5869		
1622	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99203	20611	J3301	99070,80101,V5869	

1623	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	J3301	20611		
1624	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99203	99070	80101	V5869	
1625	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	80101	v5869		
1626	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	27093	J3301	80101, V5869	
1627	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				
1628	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	J3301	20611		
1629	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	J3301	20611		
1630	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	J3301	20611	80101, V5869	
1631	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				
1632	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99203	J1885	99070	80101, V5869	
1633	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				
1634	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				
1635	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	J1885			
1636	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	J3301	20611		
1637	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				
1638	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				
1639	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				
1640	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	80101	v5869		
1641	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				
1642	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99203	J3301	20605	99070,80101,V5869	
1643	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99203	99070	80101	V5869	
1644	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				
1645	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				
1646	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99203	80101	v5869		
1647	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	80101	v5869		
1648	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99223	80101	v5869		
1649	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99233	80101	v5869		
1650	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99243				
1651	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99253	J3301	20552	80101	
1652	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99263				
1653	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99273				
1654	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99283	J1885	80101	V5869	
1655	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99293				
1656	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99303	80101	v5869		
1657	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99313	80101	v5869		
1658	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99323				
1659	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99333				
1660	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99343				
1661	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99353	20611	J7321 (X2)	80101, V5869	
1662	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99203	99070	80101	V5869	
1663	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				
1664	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99203	99070	80101	V5869	
1665	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	20611	J3301		
1666	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	80101	v5869	G0431	
1667	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	80101	v5869		
1668	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				
1669	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				
1670	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99203				
1671	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				
1672	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	J1885			
1673	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	80101	v5869		
1674	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				
1675	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99203	99070	80101	V5869	
1676	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				
1677	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				
1678	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				

1679	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	80101	v5869		
1680	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				
1681	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	80101	v5869		
1682	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				
1683	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				
1684	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				
1685	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	J3301	20552		
1686	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				
1687	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				
1688	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				
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1690	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				
1691	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				
1692	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99203	99070	80101	V5869	
1693	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	G0431			
1694	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				
1695	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	80101	v5869		
1696	RUSSO	THC	BOTHRA (NOT EXPLICIT)	62311	77003	J3301		
1697	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				
1698	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				
1699	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	J3301	20611		
1700	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99203	80101	v5869		
1701	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213				
1702	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	64405			
1703	RUSSO	THC	BOTHRA (NOT EXPLICIT)	99213	80101	v5869		
1704	END DOCUMENTS SHOW BORTHA BILLING							
1705								
1706								

EXHIBIT D

The Joint Commission

Interventional Pain Center PLLC
27423 Van DykeSuite B
Warren, MI 48093

Organization Identification Number: 596448

Initial Unannounced Full Event: 10/18/2016 - 10/19/2016

Report Contents

Executive Summary

Requirements for Improvement

Observations noted within the Requirements for Improvement (RFI) section require follow up through the Evidence of Standards Compliance (ESC) process. The timeframe assigned for completion is due in either 45 or 60 days, depending upon whether the observation was noted within a direct or indirect impact standard. (*Please Note: if your survey event resulted in a Preliminary Denial of Accreditation status, your timeframe for ESC completion will be 45 days.*) The identified timeframes of submission for each observation are found within the Requirements for Improvement Summary portion of the final onsite survey report. If a follow-up survey is required, the unannounced visit will focus on the requirements for improvement although other areas, if observed, could still become findings. The time frame for performing the unannounced follow-up visit is dependent on the scope and severity of the issues identified within the Requirements for Improvement.

Opportunities for Improvement

Observations noted within the Opportunities for Improvement (OFI) section of the report represent single instances of non-compliance noted under a C category Element of Performance. Although these observations do not require official follow up through the Evidence of Standards Compliance (ESC) process, they are included to provide your organization with a robust analysis of all instances of non-compliance noted during survey.

Executive Summary

Program(s)	Survey Date(s)
Ambulatory Health Care Accreditation	10/18/2016-10/19/2016

As a result of the survey conducted on the above date(s), the following survey findings have been identified. Your official report will be posted to your organization's confidential extranet site. It will contain specific follow-up instructions regarding your survey findings.

If you have any questions, please do not hesitate to contact your Account Executive.

Thank you for collaborating with The Joint Commission to improve the safety and quality of care provided to patients.

Requirements for Improvement – Summary

Observations noted within the Requirements for Improvement (RFI) section require follow up through the Evidence of Standards Compliance (ESC) process. The timeframe assigned for completion is due in either 45 or 60 days, depending upon whether the observation was noted within a direct or indirect impact standard. (*Please Note: if your survey event resulted in a Preliminary Denial of Accreditation status, your timeframe for ESC completion will be 45 days.*) The identified timeframes of submission for each observation are found within the Requirements for Improvement Summary portion of the final onsite survey report. If a follow-up survey is required, the unannounced visit will focus on the requirements for improvement although other areas, if observed, could still become findings. The time frame for performing the unannounced follow-up visit is dependent on the scope and severity of the issues identified within the Requirements for Improvement.

DIRECT Impact Standards:

Program:	Ambulatory Health Care Accreditation Program	
Standards:	EC.02.04.03	EP4
	EC.02.05.03	EP10
	IC.02.02.01	EP2
	LD.04.01.01	EP15
	MM.01.02.01	EP1,EP2
	PC.03.01.03	EP14,EP15
	PC.03.01.05	EP1
	PC.03.01.07	EP1,EP5
	UP.01.03.01	EP5
	WT.03.01.01	EP5

INDIRECT Impact Standards:

Program:	Ambulatory Health Care Accreditation Program	
Standards:	EC.02.03.03	EP2
	EC.02.03.05	EP5,EP15
	EC.02.05.07	EP1
	EC.02.06.01	EP1,EP13

INDIRECT Impact Standards:

HR.01.04.01	EP5
HR.02.01.03	EP3,EP16,EP24
HR.02.02.01	EP1,EP2,EP3,EP4,EP5
IC.01.01.01	EP3,EP5
IC.01.05.01	EP1,EP9
LD.01.03.01	EP2
LS.03.01.30	EP5
MM.01.01.03	EP1,EP2
NPSG.07.01.01	EP2
RI.01.01.01	EP2
RI.01.05.01	EP1
WT.01.01.01	EP2
WT.05.01.01	EP3

CFC: §416.41 **Tag:** Q-0040 **Deficiency:** Condition

Corresponds to: AHC - LD.01.03.01/EP2

Text: §416.41 Condition for Coverage: Governing Body and Management

The ASC must have a governing body that assumes full legal responsibility for determining, implementing, and monitoring policies governing the ASC's total operation. The governing body has oversight and accountability for the quality assessment and performance improvement program, ensures that the facility policies and programs are administered so as to provide quality healthcare in a safe environment, and develops and maintains a disaster preparedness plan.

CFC: §416.42 **Tag:** Q-0060 **Deficiency:** Standard

Corresponds to: AHC

Text: §416.42 Condition for Coverage: Surgical Services

Surgical procedures must be performed in a safe manner by qualified physicians who have been granted clinical privileges by the governing body of the ASC in accordance with approved policies and procedures of the ASC.

CFC Standard	Tag	Corresponds to	Deficiency
§416.42(a)(2)	Q-0062	AHC - PC.03.01.07/EP1, EP5	Standard

CFC: §416.44 **Tag:** Q-0100 **Deficiency:** Condition

Corresponds to: AHC - EC.02.06.01/EP1

Text: §416.44 Conditions for Coverage: Environment

The ASC must have a safe and sanitary environment, properly constructed, equipped, and maintained to protect the health and safety of patients.

CFC Standard	Tag	Corresponds to	Deficiency
§416.44(a)	Q-0101	AHC - EC.02.04.03/EP4, EC.02.05.07/EP1	Standard
§416.44(b)	Q-0104	AHC - EC.02.03.05/EP5, EP15	Standard
§416.44(a)(1)	Q-0101	AHC - EC.02.06.01/EP1, EP13	Standard
§416.44(b)(1)	Q-0104	AHC - EC.02.05.03/EP10, LS.03.01.30/EP5	Standard

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CFC: §416.45 **Tag:** Q-0120 **Deficiency:** Standard

Corresponds to: AHC

Text: §416.45 Condition for Coverage: Medical Staff

The medical staff of the ASC must be accountable to the governing body.

CFC Standard	Tag	Corresponds to	Deficiency
§416.45(c)	Q-0123	AHC - HR.02.01.03/EP24, EP3, EP16	Standard

CFC: §416.49 **Tag:** Q-0200 **Deficiency:** Standard

Corresponds to: AHC

Text: §416.49 Condition for Coverage: Laboratory and Radiology Services.

CFC Standard	Tag	Corresponds to	Deficiency
§416.49(a)	Q-0201	AHC - LD.04.01.01/EP15	Standard

CFC: §416.51 **Tag:** Q-0240 **Deficiency:** Condition

Corresponds to: AHC - IC.01.01.01/EP3

Text: §416.51 Condition for Coverage – Infection control

The ASC must maintain an infection control program that seeks to minimize infections and communicable diseases.

CFC Standard	Tag	Corresponds to	Deficiency
§416.51(a)	Q-0241	AHC - IC.02.02.01/EP2	Standard
§416.51(b)	Q-0242	AHC - IC.01.05.01/EP9	Standard
§416.51(b)(1)	Q-0243	AHC - IC.01.01.01/EP5	Standard
§416.51(b)(3)	Q-0245	AHC - IC.01.05.01/EP1	Standard

CFC: §416.50 **Tag:** Q-0219 **Deficiency:** Standard

Corresponds to: AHC - RI.01.01.01/EP2

Text: §416.50 Condition for coverage - Patient Rights

The ASC must inform the patient or the patient's representative or surrogate of the patient's rights and must protect and promote the exercise of these rights, as set forth in this section. The ASC must also post the written notice of patient rights in a place or places within the ASC likely to be noticed by patients waiting for treatment or by the patient's representative or surrogate, if applicable.

CFC Standard	Tag	Corresponds to	Deficiency
§416.50(c)(1)	Q-0224	AHC - RI.01.05.01/EP1	Standard

CFC: §416.52 **Tag:** Q-0260 **Deficiency:** Standard

Corresponds to: AHC

Text: §416.52 Conditions for Coverage: Patient Admission, Assessment and Discharge

The ASC must ensure each patient has the appropriate pre-surgical and post-surgical assessments completed and that all elements of the discharge requirements are completed.

CFC Standard	Tag	Corresponds to	Deficiency
§416.52(a)(1)	Q-0261	AHC - PC.03.01.03/EP14	Standard
§416.52(a)(2)	Q-0262	AHC - PC.03.01.03/EP15	Standard

Requirements for Improvement – Detail

Chapter: Environment of Care
Program: Ambulatory Health Care Accreditation
Standard: EC.02.03.03

Standard Text: The organization conducts fire drills.

Element(s) of Performance:

2. The organization conducts fire drills every 12 months from the date of the last drill in each area that is defined as a business occupancy by the Life Safety Code and in which care, treatment, or services are provided, or quarterly for ambulatory surgical centers seeking accreditation for Medicare certification.
Note 1: In leased or rented facilities, drills need be conducted only in areas of the building that the organization occupies.
Note 2: In sites that are used on average 70 hours or less per month, the organization may choose either to review the fire response plan or to conduct a fire drill every 12 months. This note does not apply to ambulatory surgical centers that elect to use The Joint Commission deemed status option.

Scoring Category : A
Score : Insufficient Compliance

Observation(s):

EP 2

Observed in Document Review at Interventional Pain Center PLLC (27423 Van Dyke, Suite B, Warren, MI) site.
The organization didn't present fire drill results for the period of April 2016 - September 2016.

Quarterly ⊛ Policy for Quarterly fire drills w/ Call to Fire Safety

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Chapter: Environment of Care
Program: Ambulatory Health Care Accreditation
Standard: EC.02.03.05

Standard Text: The organization maintains fire safety equipment and fire safety building features. Note: This standard does not require organizations to have the types of fire safety equipment and building features described below. However, if these types of equipment or features exist within the building, then the following maintenance, testing, and inspection requirements apply.

Element(s) of Performance:

5. Every quarter, the organization tests fire alarm equipment for notifying off-site fire responders. The completion date of the tests is documented.
Note: For additional guidance on performing tests, see NFPA 72, 1999 edition (Table 7-3.2).

Scoring Category : A
Score : Insufficient Compliance

15. At least monthly, the organization inspects portable fire extinguishers. The completion dates of the inspections are documented.
Note 1: There are many ways to document the inspections, such as using bar-coding equipment, using check marks on a tag, or using an inventory.
Note 2: Inspections involve a visual check for the presence and correct type of extinguisher, broken parts, full charge, and ease of access.
Note 3: For additional guidance on inspection of fire extinguishers, see NFPA 10, Standard for Portable Fire Extinguishers, 1998 edition (Sections 1-6, 4-3, and 4-4).

Scoring Category : C
Score : Partial Compliance

Observation(s):

EP 5
§416.44(b) - (Q-0104) - §416.44(b) Standard: Safety From Fire
This Standard is NOT MET as evidenced by:

Observed in Document Review at Interventional Pain Center PLLC (27423 Van Dyke, Suite B, Warren, MI) site for the Ambulatory Surgical Center deemed service.
For the period of April 2016 - September 2016, the organization didn't present test results for the fire alarm equipment for notifying off-site fire responders. Call monitoring Company

EP 15
§416.44(b) - (Q-0104) - §416.44(b) Standard: Safety From Fire
This Standard is NOT MET as evidenced by:

Observed in Building Tour at Interventional Pain Center PLLC (27423 Van Dyke, Suite B, Warren, MI) site for the Ambulatory Surgical Center deemed service.
In 2 of 2 fire extinguisher checks, the organization didn't record inspection results for the period of April 2016 - September 2016. The extinguishers were located in the waiting room and patient preparation area respectively.

self checks

Chapter: Environment of Care
Program: Ambulatory Health Care Accreditation
Standard: EC.02.04.03
Standard Text: The organization inspects, tests, and maintains medical equipment.
Element(s) of Performance:

4. The organization conducts performance testing of and maintains all sterilizers. These activities are documented. (See also IC.02.02.01, EP 2)

3

Scoring Category : A
Score : Insufficient Compliance

Observation(s):

EP 4
§416.44(a) - (Q-0101) - §416.44 Standard: Physical Environment

(a) The ASC must provide a functional and sanitary environment for the provision of surgical services.
This Standard is NOT MET as evidenced by:

Observed in Infection Control System Tracer at Interventional Pain Center PLLC (27423 Van Dyke, Suite B, Warren, MI) site for the Ambulatory Surgical Center deemed service.
The weekly maintenance of the autoclave as per the manufacturer's guidelines has not been documented as completed.

(V)

Observed in Individual Tracer at Interventional Pain Center PLLC (27423 Van Dyke, Suite B, Warren, MI) site for the Ambulatory Surgical Center deemed service.
The monthly maintenance of the autoclave as per the manufacturer's guidelines has not been documented as completed

(V)

Chapter: Environment of Care

Program: Ambulatory Health Care Accreditation

Standard: EC.02.05.03

Standard Text: The organization has a reliable emergency electrical power source.

Element(s) of Performance:

10. For ambulatory surgical centers that elect to use The Joint Commission deemed status option: For facilities that were constructed, had a change in occupancy type, or have undergone an electrical system upgrade since 1983, the organization has a Type I or Type 3 essential electrical systems (EES) in accordance with NFPA 99, 1999 edition.

Scoring Category : A
Score : Insufficient Compliance

Observation(s):

EP 10
§416.44(b)(1) - (Q-0104) - (1) Except as otherwise provided in this section, the ASC must meet the provision applicable to the ambulatory Healthcare Center of the 2000 edition of the Life Safety code of the National Fire protection Association, regardless of the number of patients served. The Director of the Office of the Federal Register has approved the NFPA 101®2000 edition of the Life Safety code, issued January 14, 2000, for incorporation by reference in accordance with 5 U.S.C. 552(a) and 1 CFR part 51. A copy of the code is available for inspection at the CMS Information Recourse Center, 7500 Security Boulevard, Baltimore, MD and at the National Archives and Records Administration (NARA). For information o the availability of this material at NARA, call 202-741-6030, or go to http://www.archives.gov/federalregister/code_of_federal_regulations/ibr_locations.html. Copies may be obtained from the National Fire Protection Association, 1 Batterymarch Park, Quincy, MA 02269. If any changes in this edition of the Code are incorporated by reference, CMS will publish notice in the Federal Register to announce the changes.
This Standard is NOT MET as evidenced by:

Observed in Building Tour at Interventional Pain Center PLLC (27423 Van Dyke, Suite B, Warren, MI) site for the Ambulatory Surgical Center deemed service.
The organization didn't have a battery back-up system to supply power to emergency lighting, patient equipment and monitors.

Will remind to me

Ok to see if Battery Backup

Chapter: Environment of Care

Program: Ambulatory Health Care Accreditation

Standard: EC.02.05.07

Standard Text: The organization inspects, tests, and maintains emergency power systems. Note: This standard does not require organizations to have the types of emergency power equipment discussed below. However, if these types of equipment exist within the building, then the following maintenance, testing, and inspection requirements apply.

Element(s) of Performance:

1. At least monthly, the organization performs a functional test of battery-powered lights required for egress for a minimum duration of 30 seconds. The completion date of the tests is documented.

Scoring Category : C
Score : Insufficient Compliance

Observation(s):

EP 1
§416.44(a) - (Q-0101) - §416.44 Standard: Physical Environment

(a) The ASC must provide a functional and sanitary environment for the provision of surgical services.
This Standard is NOT MET as evidenced by:

Observed in Document Review at Interventional Pain Center PLLC (27423 Van Dyke, Suite B, Warren, MI) site for the Ambulatory Surgical Center deemed service.
In 4 of 4 battery-powered lights, the organization didn't present monthly inspection results.
30 second ch every month.

Chapter: Environment of Care
Program: Ambulatory Health Care Accreditation
Standard: EC.02.06.01
Standard Text: The organization establishes and maintains a safe, functional environment.

Element(s) of Performance:

1. Interior spaces meet the needs of the patient population and are safe and suitable to the care, treatment, or services provided.

Scoring Category : C
Score : Partial Compliance

13. The organization maintains ventilation, temperature, and humidity levels suitable for the care, treatment, or services provided. (See also EC.02.05.01, EP 6)

Scoring Category : A
Score : Insufficient Compliance

Observation(s):

EP 1
§416.44 - (Q-0100) - §416.44 Condition for Coverage: Environment
This Condition is NOT MET as evidenced by:
§416.44(a)(1) - (Q-0101) - (1) Each operating room must be designed and equipped so that the types of surgery conducted can be performed in a manner that protects the lives and assures the physical safety of all individuals in the area.
This Standard is NOT MET as evidenced by:

Observed in Building Tour at Interventional Pain Center PLLC (27423 Van Dyke, Suite B, Warren, MI) site for the Ambulatory Surgical Center deemed service.
There was an in-use O2 E-cylinder tank stored with the full O2 E-cylinder tanks.

Observed in Building Tour at Interventional Pain Center PLLC (27423 Van Dyke, Suite B, Warren, MI) site for the Ambulatory Surgical Center deemed service.
There were office supplies stored within 3 feet of sub-electrical panel LPF (correct).

EP 13
§416.44(a)(1) - (Q-0101) - (1) Each operating room must be designed and equipped so that the types of surgery conducted can be performed in a manner that protects the lives and assures the physical safety of all individuals in the area.
This Standard is NOT MET as evidenced by:

Observed in Building Tour at Interventional Pain Center PLLC (27423 Van Dyke, Suite B, Warren, MI) site for the Ambulatory Surgical Center deemed service.
The organization did not present temperature and humidity logs for the wrapped sterile instruments stored in procedure room #2. Temp Humidity monitor w/ Daily Log. 30%-60% Humidity Temp

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Chapter: Human Resources
Program: Ambulatory Health Care Accreditation
Standard: HR.01.04.01
Standard Text: The organization provides orientation to staff.
Element(s) of Performance:

5. The organization orients staff on the following: Sensitivity to cultural diversity based on their job duties and responsibilities. Completion of this orientation is documented.

Scoring Category : C
Score : Insufficient Compliance

Observation(s):

EP 5

Observed in HR File Review at Interventional Pain Center PLLC (27423 Van Dyke, Suite B, Warren, MI) site. In 7 of 7 HR files reviewed, it was noted that documentation of orientation to sensitivity to cultural diversity based on their job duties and responsibilities was not evident in the personnel files.

Chapter: Human Resources

Program: Ambulatory Health Care Accreditation

Standard: HR.02.01.03

Standard Text: The organization grants initial, renewed, or revised clinical privileges to individuals who are permitted by law and the organization to practice independently.

Element(s) of Performance:

3. Before granting initial or revised privileges, the organization uses primary sources when documenting training specific to the privileges requested. (See also PC.03.01.01, EP 1)
Note 1: The verification of relevant training informs the organization of the licensed independent practitioner's clinical knowledge and skill set. Verification must be obtained from the primary source of the specific credential. Primary sources include the specialty certifying boards approved by the American Dental Association for a dentist's board certification, letters from professional schools (for example, medical, dental, nursing) and letters from postgraduate education or postdoctoral programs for completion of training. Designated equivalent sources include, but are not limited to, the following:
- The American Medical Association (AMA) Physician Masterfile for verification of a physician's U.S. and Puerto Rico medical school graduation and residency completion
- The American Board of Medical Specialties (ABMS) for verification of a physician's board certification
- The Educational Commission for Foreign Medical Graduates (ECFMG) for verification of a physician's graduation from a foreign medical school
- The American Osteopathic Association (AOA) Physician Database for predoctoral education accredited by the AOA Bureau of Professional Education, postdoctoral education approved by the AOA Council on Postdoctoral Training, and Osteopathic Specialty Board Certification
- The Federation of State Medical Boards (FSMB) for all actions against a physician's medical license
- The American Academy of Physician Assistants (AAPA) Profile for physician assistant education, provided through the AMA Physician Profile Service (https://profiles.ama-assn.org/amaprofiles/)
Note 2: A primary source of verified information may designate to an agency the role of communicating credentials information. The designated agency then becomes acceptable to be used as a primary source.
Note 3: An external organization (for example, a credentials verification organization [CVO]) or a Joint Commission–accredited health care organization functioning as a CVO may be used to collect credentialing information. Both of these organizations must meet the CVO guidelines listed in the Glossary.
Note 4: When it is not possible to obtain information from the primary source, reliable secondary sources may be used. A reliable secondary source could be another health care organization that has documented primary source verification of the applicant's credentials.

Scoring Category : A
Score : Insufficient Compliance

16. Before granting initial, renewed, or revised privileges to a licensed independent practitioner, leadership evaluates the following: Information from the National Practitioner Data Bank.

Scoring Category : A
Score : Insufficient Compliance

24. The organization notifies the requesting practitioner about the decision to grant, renew, or deny requested privileges. The notification may be in either written or electronic format.

Scoring Category : C
Score : Insufficient Compliance

Observation(s):

EP 3
§416.45(c) - (Q-0123) - §416.45(c) Standard: Other Practitioners

If the ASC assigns patient care responsibilities to practitioners other than physicians, it must have established policies and procedures, approved by the governing body, for overseeing and evaluating their clinical activities. This Standard is NOT MET as evidenced by:

Observed in Credentialing and Privileging at Interventional Pain Center PLLC (27423 Van Dyke, Suite B, Warren, MI) site for the Ambulatory Surgical Center deemed service.
In 3 of 3 medical staff/credentialing files reviewed, the primary source documentation of training was Not compiled in the credentialing file before the privileges were granted

EP 16
§416.45(c) - (Q-0123) - §416.45(c) Standard: Other Practitioners

If the ASC assigns patient care responsibilities to practitioners other than physicians, it must have established policies and procedures, approved by the governing body, for overseeing and evaluating their clinical activities. This Standard is NOT MET as evidenced by:

Observed in Credentialing and Privileging at Interventional Pain Center PLLC (27423 Van Dyke, Suite B, Warren, MI) site for the Ambulatory Surgical Center deemed service.
In 3 of 3 medical staff/credentialing files reviewed, it was noted that the information from the National Practitioner Data Bank was not reviewed before the privileges were granted.

EP 24
§416.45(c) - (Q-0123) - §416.45(c) Standard: Other Practitioners

If the ASC assigns patient care responsibilities to practitioners other than physicians, it must have established policies and procedures, approved by the governing body, for overseeing and evaluating their clinical activities. This Standard is NOT MET as evidenced by:

Observed in Credentialing and Privileging at Interventional Pain Center PLLC (27423 Van Dyke, Suite B, Warren, MI) site for the Ambulatory Surgical Center deemed service.
In 3 of 3 medical staff/credentialing files reviewed, it was noted that the organization did not notify the practitioner about the decision to grant the requested privileges.

Chapter: Human Resources

Program: Ambulatory Health Care Accreditation

Standard: HR.02.02.01

Standard Text: The organization provides orientation to licensed independent practitioners.

Element(s) of Performance:

1. The organization determines the key safety content of orientation provided to licensed independent practitioners.
Note: Key safety content may include specific processes and procedures related to the provision of care, the environment of care, and infection control.

Scoring Category : A
Score : Insufficient Compliance

2. The organization orients its licensed independent practitioners to key safety content before they provide care, treatment, or services. Completion of this orientation is documented.

Scoring Category : C
Score : Insufficient Compliance

3. The organization orients licensed independent practitioners on the following: Relevant policies and procedures. Completion of this orientation is documented.

Scoring Category : C
Score : Insufficient Compliance

4. The organization orients licensed independent practitioners on the following: Their specific responsibilities, including those related to infection prevention and control and assessing and managing pain. Completion of this orientation is documented. (See also IC.01.05.01, EP 6; RI.01.01.01, EP 8)

Scoring Category : C
Score : Insufficient Compliance

5. The organization orients licensed independent practitioners on the following: Sensitivity to cultural diversity based on their specific responsibilities. Completion of this orientation is documented.

Scoring Category : C
Score : Insufficient Compliance

Observation(s):

EP 1

Observed in Credentialing and Privileging at Interventional Pain Center PLLC (27423 Van Dyke, Suite B, Warren, MI) site.
In 3 of 3 medical staff/credentialing files reviewed, after review of the organization's documents and administration it was determined that no key safety content of orientation for the licensed independent practitioners had been formulated.

EP 2

Observed in Credentialing and Privileging at Interventional Pain Center PLLC (27423 Van Dyke, Suite B, Warren, MI) site.
In 3 of 3 medical staff/credentialing files reviewed, it was noted that completion of orientation to key safety content before they provide care, treatment, or services is not documented in the credentialing files.

EP 3

Observed in Credentialing and Privileging at Interventional Pain Center PLLC (27423 Van Dyke, Suite B, Warren, MI) site.
In 3 of 3 medical staff/credentialing files reviewed, it was noted that completion of orientation to relevant policies and procedures before they provide care, treatment, or services is not documented in the credentialing files.

EP 4

Observed in Credentialing and Privileging at Interventional Pain Center PLLC (27423 Van Dyke, Suite B, Warren, MI) site.
In 3 of 3 medical staff/credentialing files reviewed, it was noted that completion of orientation to their specific responsibilities, including those related to infection prevention and control and assessing and managing pain before they provide care, treatment, or services is not documented in the credentialing files.

EP 5

Observed in Credentialing and Privileging at Interventional Pain Center PLLC (27423 Van Dyke, Suite B, Warren, MI) site.
In 3 of 3 medical staff/credentialing files reviewed, it was noted that completion of orientation to sensitivity to cultural diversity based on their specific responsibilities before they provide care, treatment, or services is not documented in the credentialing files.

Chapter: Infection Prevention and Control

Program: Ambulatory Health Care Accreditation

Standard: IC.01.01.01

Standard Text: The organization identifies the individual(s) responsible for infection prevention and control.

Element(s) of Performance:

3. The organization assigns responsibility for the management of infection prevention and control activities. (See also HR.01.02.01, EP 1; LD.03.06.01, EP 3)

Scoring Category : A
Score : Insufficient Compliance

5. For ambulatory surgical centers that elect to use The Joint Commission deemed status option: The infection control program is under the direction of a designated and qualified professional who has training in infection control.

Scoring Category : A
Score : Insufficient Compliance

Observation(s):

EP 3
§416.51 - (Q-0240) - §416.51 Condition for Coverage: Infection Control
This Condition is NOT MET as evidenced by:

Observed in HR File Review at Interventional Pain Center PLLC (27423 Van Dyke, Suite B, Warren, MI) site for the Ambulatory Surgical Center deemed service.
Upon review of the nurse's personnel file that was designated as the infection control nurse, it was noted that the organization did not assign responsibility for the management of infection prevention and control activities.

EP 5
§416.51(b)(1) - (Q-0243) - (1) Under the direction of a designated and qualified professional who has training in infection control;
This Standard is NOT MET as evidenced by:

Observed in HR File Review at Interventional Pain Center PLLC (27423 Van Dyke, Suite B, Warren, MI) site for the Ambulatory Surgical Center deemed service.
It was noted that the nurse has not had training in infection control.

Chapter: Infection Prevention and Control

Program: Ambulatory Health Care Accreditation

Standard: IC.01.05.01

Standard Text: The organization plans for preventing and controlling infections.

Element(s) of Performance:

1. When developing infection prevention and control activities, the organization uses evidence-based national guidelines or, in the absence of such guidelines, expert consensus.
For ambulatory surgical centers that elect to use The Joint Commission deemed status option: The organization considers, selects, and implements nationally recognized infection control program guidelines.

Scoring Category : A
Score : Insufficient Compliance

9. For ambulatory surgical centers that elect to use The Joint Commission deemed status option: The organization plans infection prevention and control activities, including surveillance, to minimize, reduce, or eliminate the risk of infection and communicable diseases. These activities are documented.

Scoring Category : A
Score : Insufficient Compliance

Observation(s):

EP 1
§416.51(b)(3) - (Q-0245) - (3) Responsible for providing a plan of action for preventing, identifying, and managing infections and communicable diseases and for immediately implementing corrective and preventive measures that result in improvement.
This Standard is NOT MET as evidenced by:

Observed in Infection Control System Tracer at Interventional Pain Center PLLC (27423 Van Dyke, Suite B, Warren, MI) site for the Ambulatory Surgical Center deemed service.
The organization did use evidence-based national guidelines while developing infection prevention and control activities. AORN Guidelines

EP 9
§416.51(b) - (Q-0242) - §416.51(b) Standard: Infection control program.

The ASC must maintain an ongoing program designed to prevent, control, and investigate infections and communicable diseases. In addition, the infection control and prevention program must include documentation that the ASC has considered, selected, and implemented nationally recognized infection control guidelines. [...]
This Standard is NOT MET as evidenced by:

Observed in Infection Control System Tracer at Interventional Pain Center PLLC (27423 Van Dyke, Suite B, Warren, MI) site for the Ambulatory Surgical Center deemed service.
While the organization reports that no surgical site infections have surfaced there was no documentation to support the report.

Chapter: Infection Prevention and Control

Program: Ambulatory Health Care Accreditation

Standard: IC.02.02.01

Standard Text: The organization reduces the risk of infections associated with medical equipment, devices, and supplies.

Element(s) of Performance:

2. The organization implements infection prevention and control activities when doing the following: Performing intermediate and high-level disinfection and sterilization of medical equipment, devices, and supplies. * (See also EC.02.04.03, EP 4)
Note: Sterilization is used for items such as implants and surgical instruments. High-level disinfection may also be used if sterilization is not possible, as is the case with flexible endoscopes.
Footnote *: For further information regarding performing intermediate and high-level disinfection of medical equipment, devices, and supplies, refer to the website of the Centers for Disease Control and Prevention (CDC) at http://www.cdc.gov/hicpac/Disinfection_Sterilization/acknowledg.html (Sterilization and Disinfection in Healthcare Settings).

Scoring Category : A
Score : Insufficient Compliance

Observation(s):

EP 2
§416.51(a) - (Q-0241) - §416.51(a) Standard: Sanitary environment

The ASC must provide a functional and sanitary environment for the provision of surgical services by adhering to professionally acceptable standards of practice.
This Standard is NOT MET as evidenced by:

Observed in Individual Tracer at Interventional Pain Center PLLC (27423 Van Dyke, Suite B, Warren, MI) site for the Ambulatory Surgical Center deemed service.
During review of the process of autoclave procedure it was noted that the organization did not document the time, pressure and temperature of the cycle used.

Chapter: Leadership
Program: Ambulatory Health Care Accreditation
Standard: LD.01.03.01
Standard Text: Governance is ultimately accountable for the safety and quality of care, treatment, or services.

Element(s) of Performance:

2. Governance provides for organization management and planning.

Scoring Category : A
Score : Insufficient Compliance

Observation(s):

EP 2
§416.41 - (Q-0040) - §416.41 Condition for Coverage: Governing Body and Management
This Condition is NOT MET as evidenced by:

Observed in Auto Score for CLD at Interventional Pain Center PLLC (27423 Van Dyke, Suite B, Warren, MI) site for the Ambulatory Surgical Center deemed service.
The governing body/leadership did not ensure that the following Conditions of Participation were met as determined through observations, documentation, and staff interviews: §416.41 - (Q-0040), §416.44 - (Q-0100), §416.51 - (Q-0240)

Chapter: Leadership

Program: Ambulatory Health Care Accreditation

Standard: LD.04.01.01

Standard Text: The organization complies with law and regulation.

Element(s) of Performance:

15. For ambulatory surgical centers that elect to use The Joint Commission deemed status option: The organization complies with part 493 of the Code of Federal Regulations.
Note: Part 493 of the Code of Federal Regulations requires organizations who perform laboratory testing to maintain compliance with the Clinical Laboratory Improvement Amendments of 1988 (CLIA '88).

Scoring Category : A
Score : Insufficient Compliance

Observation(s):

EP 15
§416.49(a) - (Q-0201) - §416.49(a) Standard: Laboratory Services.

If the ASC performs laboratory services, it must meet the requirements of part 493 of this chapter. If the ASC does not provide its own laboratory services, it must have procedures for obtaining routine and emergency laboratory services from a certified laboratory in accordance with Part 493 of this chapter. The referral laboratory must be certified in the appropriate specialties and subspecialties of service to perform the referred tests in accordance with the requirements of Part 493 of this chapter.
This Standard is NOT MET as evidenced by:

Observed in Individual Tracer at Interventional Pain Center PLLC (27423 Van Dyke, Suite B, Warren, MI) site for the Ambulatory Surgical Center deemed service.
The organization was not able to provide a valid CLIA certificate.

Chapter:	Life Safety
Program:	Ambulatory Health Care Accreditation
Standard:	LS.03.01.30
Standard Text:	The organization provides and maintains building features to protect individuals from the hazards of fire and smoke. Note 1: This standard applies to sites of care where four or more patients at the same time are provided either anesthesia or outpatient services that render patients incapable of saving themselves in an emergency in the organization. Note 2: This standard applies to all ambulatory surgical centers seeking accreditation for Medicare certification purposes, regardless of the number of patients rendered incapable. Note 3: In leased facilities, the elements of performance of this standard apply only to the space in which the accredited organization is located; all exits from the space to the outside at grade level; and any Life Safety Code building systems that support the space (for example, fire alarm system, automatic sprinkler system).

Element(s) of Performance:

5. All hazardous areas have sprinkler systems, resist the passage of smoke and have doors with self-closing or automatic-closing devices, or are enclosed with 1-hour fire-rated walls. (For full text and any exceptions, refer to NFPA 101-2000: 20/21.3.2 and 38/39.3.2.1)

Scoring Category : C
Score : Partial Compliance

Observation(s):

EP 5
§416.44(b)(1) - (Q-0104) - (1) Except as otherwise provided in this section, the ASC must meet the provision applicable to the ambulatory Healthcare Center of the 2000 edition of the Life Safety code of the National Fire protection Association, regardless of the number of patients served. The Director of the Office of the Federal Register has approved the NFPA 101®2000 edition of the Life Safety code, issued January 14, 2000, for incorporation by reference in accordance with 5 U.S.C. 552(a) and 1 CFR part 51. A copy of the code is available for inspection at the CMS Information Recourse Center, 7500 Security Boulevard, Baltimore, MD and at the National Archives and Records Administration (NARA). For information o the availability of this material at NARA, call 202-741-6030, or go to http://www.archives.gov/federalregister/code_of_federal_regulations/ibr_locations.html. Copies may be obtained from the National Fire Protection Association, 1 Batterymarch Park, Quincy, MA 02269. If any changes in this edition of the Code are incorporated by reference, CMS will publish notice in the Federal Register to announce the changes.
This Standard is NOT MET as evidenced by:

Observed in Building Tour at Interventional Pain Center PLLC (27423 Van Dyke, Suite B, Warren, MI) site for the Ambulatory Surgical Center deemed service.
The door located at the entrance to the soiled utility room was not equipped with a self closer.

Observed in Building Tour at Interventional Pain Center PLLC (27423 Van Dyke, Suite B, Warren, MI) site for the Ambulatory Surgical Center deemed service.
The walls in the soiled utility room did not extend to the roof. The walls terminated a few inches above the drop ceiling. The facility was not equipped with an automatic sprinkler system.

Chapter: Medication Management

Program: Ambulatory Health Care Accreditation

Standard: MM.01.01.03

Standard Text: The organization safely manages high-alert and hazardous medications.

Element(s) of Performance:

1. The organization identifies, in writing, its high-alert and hazardous medications. * (See also EC.02.02.01, EP 8)
Note: This element of performance is also applicable to sample medications.
Footnote *: For a list of high-alert medications, see http://www.ismp.org. For a list of hazardous medications, see http://www.cdc.gov/niosh/docs/2014-138/pdfs/2014-138_v3.pdf.

Scoring Category : A
Score : Insufficient Compliance

2. The organization has a process for managing high-alert and hazardous medications. (See also EC.02.02.01, EP 8; MM.03.01.01, EP 9)
Note: This element of performance is also applicable to sample medications.

Scoring Category : A
Score : Insufficient Compliance

Observation(s):

EP 1

Observed in Individual Tracer at Interventional Pain Center PLLC (27423 Van Dyke, Suite B, Warren, MI) site. The organization did not identify, in writing, its high-alert and hazardous medications.

EP 2

Observed in Individual Tracer at Interventional Pain Center PLLC (27423 Van Dyke, Suite B, Warren, MI) site. The organization could not demonstrate a process for managing high-alert and hazardous medications.

Chapter: Medication Management

Program: Ambulatory Health Care Accreditation

Standard: MM.01.02.01

Standard Text: The organization addresses the safe use of look-alike/sound-alike medications.

Element(s) of Performance:

1. The organization develops a list of look-alike/sound-alike medications it stores, dispenses, or administers.
Note 1: One source of look-alike/sound-alike medications is The Institute for Safe Medication Practices (http://www.ismp.org/Tools/confuseddrugnames.pdf).
Note 2: This element of performance is also applicable to sample medications.

Scoring Category : A
Score : Insufficient Compliance

2. The organization takes action to prevent errors involving the interchange of the medications on its list of look-alike/sound-alike medications.
Note: This element of performance is also applicable to sample medications.

Scoring Category : A
Score : Insufficient Compliance

Observation(s):

EP 1

Observed in Individual Tracer at Interventional Pain Center PLLC (27423 Van Dyke, Suite B, Warren, MI) site. The organization could not produce a document of a list of look-alike/sound-alike medications it stores, dispenses, or administers.

EP 2

Observed in Individual Tracer at Interventional Pain Center PLLC (27423 Van Dyke, Suite B, Warren, MI) site. The organization had no action plan in place to prevent errors involving the interchange of the medications on its look-alike/sound-alike medications.

Chapter: National Patient Safety Goals

Program: Ambulatory Health Care Accreditation

Standard: NPSG.07.01.01

Standard Text: Comply with either the current Centers for Disease Control and Prevention (CDC) hand hygiene guidelines or the current World Health Organization (WHO) hand hygiene guidelines.

Element(s) of Performance:

2. Set goals for improving compliance with hand hygiene guidelines. (See also IC.03.01.01, EP 3)

Scoring Category : A
Score : Insufficient Compliance

Observation(s):

EP 2

Observed in Infection Control System Tracer at Interventional Pain Center PLLC (27423 Van Dyke, Suite B, Warren, MI) site.
The infection control nurse could not show documentation of goals for improving compliance with hand hygiene guidelines.

Chapter: National Patient Safety Goals

Program: Ambulatory Health Care Accreditation

Standard: UP.01.03.01

Standard Text: A time-out is performed before the procedure.

Element(s) of Performance:

5. Document the completion of the time-out.
Note: The organization determines the amount and type of documentation.

Scoring Category : C
Score : Insufficient Compliance

Observation(s):

EP 5

Observed in Individual Tracer at Interventional Pain Center PLLC (27423 Van Dyke, Suite B, Warren, MI) site.
In 24 of 24 During the individual tracers and chart review, it was noted that the time out documentation was not completed as the organization's time out policy stated.

Chapter: Provision of Care, Treatment, and Services

Program: Ambulatory Health Care Accreditation

Standard: PC.03.01.03

Standard Text: The organization provides the patient with care before initiating operative or other high-risk procedures, including those that require the administration of moderate or deep sedation or anesthesia.

Element(s) of Performance:

14. For ambulatory surgical centers that elect to use The Joint Commission deemed status option: A comprehensive medical history and physical assessment is completed for each patient by a physician (as defined in section 1861(r) of the Social Security Act) or other qualified practitioner, in accordance with applicable state health and safety laws, standards of practice, and organization policy.

Scoring Category : C
Score : Insufficient Compliance

15. For ambulatory surgical centers that elect to use The Joint Commission deemed status option: Each patient has a presurgical assessment completed upon admission by a physician or other qualified practitioner, in accordance with applicable state health and safety laws, standards of practice, and organization policy. This assessment includes any changes in the patient's condition since the patient's most recent medical examination, and documentation of any allergies to drugs and biologicals.

Scoring Category : C
Score : Insufficient Compliance

Observation(s):

EP 14
§416.52(a)(1) - (Q-0261) - (1) Not more than 30 days before the date of the scheduled surgery, each patient must have a comprehensive medical history and physical assessment completed by a physician (as defined in section 1861(r) of the Act) or other qualified practitioner in accordance with applicable State health and safety laws, standards of practice, and ASC policy.
This Standard is NOT MET as evidenced by:

Observed in Individual Tracer at Interventional Pain Center PLLC (27423 Van Dyke, Suite B, Warren, MI) site for the Ambulatory Surgical Center deemed service.
In 26 of 26 patient records reviewed, it was noted that a comprehensive medical history and physical assessment is completed by the physician performing the procedure was not documented in the patient's chart.

EP 15
§416.52(a)(2) - (Q-0262) - (2) Upon admission, each patient must have a pre-surgical assessment completed by a physician or other qualified practitioner in accordance with applicable State health and safety laws, standards of practice, and ASC policy that includes, at a minimum, an updated medical record entry documenting an examination for any changes in the patient's condition since completion of the most recently documented medical history and physical assessment, including documentation of any allergies to drugs and biologicals.
This Standard is NOT MET as evidenced by:

Observed in Record Review at Interventional Pain Center PLLC (27423 Van Dyke, Suite B, Warren, MI) site for the Ambulatory Surgical Center deemed service.
In 26 of 26 patient records reviewed, it was noted that the preanesthetic assessment was incomplete and missing information in several areas, such as vitals signs, height, weight, laboratory results review and review of systems.

Chapter:	Provision of Care, Treatment, and Services
Program:	Ambulatory Health Care Accreditation
Standard:	PC.03.01.05
Standard Text:	The organization monitors the patient during operative or other high-risk procedures and/or during the administration of moderate or deep sedation or anesthesia.

Element(s) of Performance:

1. During operative or other high risk procedures, including those that require the administration of moderate or deep sedation or anesthesia, the patient's oxygenation, ventilation, and circulation are monitored continuously. (See also RC.02.01.03, EP 8)

Scoring Category : A
Score : Insufficient Compliance

Observation(s):

EP 1

Observed in Individual Tracer at Interventional Pain Center PLLC (27423 Van Dyke, Suite B, Warren, MI) site.
In 26 of 26 during individual tracer and patient chart review, it was noted that EKG monitoring was not being performed and not noted as being performed whereas the policy entitled "Anesthesia - Use of anesthesia" stated "Patients are EKG monitored in the procedure room during the procedure."

Chapter:	Provision of Care, Treatment, and Services
Program:	Ambulatory Health Care Accreditation
Standard:	PC.03.01.07
Standard Text:	The organization provides care to the patient after operative or other high-risk procedures and/or the administration of moderate or deep sedation or anesthesia.

Element(s) of Performance:

1. The organization assesses the patient's physiological status immediately after the operative or other high risk procedure and/or as the patient recovers from moderate or deep sedation or anesthesia. (See also RC.02.01.03, EP 8)

Scoring Category : A
Score : Insufficient Compliance

5. For ambulatory surgical centers that elect to use The Joint Commission deemed status option: Each patient is evaluated by a physician (as defined in section 1861(r) of the Social Security Act), or an anesthetist (as defined by law and regulation) for proper recovery before discharge from the ambulatory surgical center.

Scoring Category : A
Score : Insufficient Compliance

Observation(s):

EP 1
§416.42(a)(2) - (Q-0062) - (2) Before discharge from the ASC, each patient must be evaluated by a physician or by an anesthetist as defined at §410.69(b) of this chapter, in accordance with applicable State health and safety laws, standards of practice, and ASC policy, for proper anesthesia recovery.
This Standard is NOT MET as evidenced by:

Observed in Individual Tracer at Interventional Pain Center PLLC (27423 Van Dyke, Suite B, Warren, MI) site for the Ambulatory Surgical Center deemed service.
The medical assistant escorted the patient from the operating room to the post anesthesia care area where another medical assistant obtained a set of vital signs whereas the policy entitled "PACU - Patient Discharge" states "the PACU record must be completed and signed by the RN discharging the patient".

EP 5
§416.42(a)(2) - (Q-0062) - (2) Before discharge from the ASC, each patient must be evaluated by a physician or by an anesthetist as defined at §410.69(b) of this chapter, in accordance with applicable State health and safety laws, standards of practice, and ASC policy, for proper anesthesia recovery.
This Standard is NOT MET as evidenced by:

Observed in Individual Tracer at Interventional Pain Center PLLC (27423 Van Dyke, Suite B, Warren, MI) site for the Ambulatory Surgical Center deemed service.
After the procedural sedation was given by the Anesthesiologist, he did not document in the chart that the patient had adequately recovered from the sedation drugs administered.

Chapter: Rights and Responsibilities of the Individual

Program: Ambulatory Health Care Accreditation

Standard: RI.01.01.01

Standard Text: The organization respects patient rights.

Element(s) of Performance:

2. For ambulatory surgical centers that elect to use The Joint Commission deemed status option: The ambulatory surgical center informs the patient of his or her rights.

Scoring Category : A
Score : Insufficient Compliance

Observation(s):

EP 2
§416.50 - (Q-0219) - §416.50 Condition for Coverage: Condition for coverage - Patient Rights
This Standard is NOT MET as evidenced by:

Observed in Individual Tracer at Interventional Pain Center PLLC (27423 Van Dyke, Suite B, Warren, MI) site for the Ambulatory Surgical Center deemed service.
After observing care from front desk to discharge, no indication for this deemed facility that the patient had been informed of their rights and the discharge instructions state that the patient received a copy of said rights which was also not witnessed.

Chapter: Rights and Responsibilities of the Individual

Program: Ambulatory Health Care Accreditation

Standard: RI.01.05.01

Standard Text: The organization addresses patient decisions about care, treatment, or services received at the end of life.

Element(s) of Performance:

1. The organization has written policies on advance directives.

Scoring Category : A
Score : Insufficient Compliance

Observation(s):

EP 1
§416.50(c)(1) - (Q-0224) - (1) Provide the patient or, as appropriate, the patient's representative prior to the start of the surgical procedure with written information concerning its policies on advance directives, including a description of applicable State health and safety laws and, if requested, official State advance directive forms.
This Standard is NOT MET as evidenced by:

Observed in Individual Tracer at Interventional Pain Center PLLC (27423 Van Dyke, Suite B, Warren, MI) site for the Ambulatory Surgical Center deemed service.
After document review and discussion with clinical leadership, it was determined there is no Advance Directive policy.

Chapter: Waived Testing

Program: Ambulatory Health Care Accreditation

Standard: WT.01.01.01

Standard Text: Policies and procedures for waived tests are established, current, approved, and readily available.

Element(s) of Performance:

2. The person from the organization whose name appears on the Clinical Laboratory Improvement Amendments of 1988 (CLIA '88) certificate, or a qualified designee, establishes written policies and procedures for waived testing that address the following:
- Clinical usage and limitations of the test methodology
- Need for confirmatory testing and result follow-up recommendations (for example, a recommendation to repeat the test when results are higher or lower than the reportable range of the test)
- Specimen type, collection, and identification, and required labeling
- Specimen preservation, if applicable
- Instrument maintenance and function checks, such as calibration
- Storage conditions for test components
- Reagent use, including not using a reagent after its expiration date
- Quality control (including frequency and type) and remedial action
- Test performance
- Result reporting, including not reporting individual patient results unless quality control is acceptable
- Equipment performance evaluation

Note: The designee should be knowledgeable by virtue of training, experience, and competence about the waived testing performed.

Scoring Category : A
Score : Insufficient Compliance

Observation(s):

EP 2

Observed in Individual Tracer at Interventional Pain Center PLLC (27423 Van Dyke, Suite B, Warren, MI) site. it was noted that the organization did not document a waived testing policy that addresses the following: clinical usage and limitations of the test methodology, need for confirmatory testing and result follow-up recommendations, specimen type, collection, and identification, and required labeling specimen preservation, instrument maintenance and function checks, storage conditions for test components, reagent use, quality control, test performance, result reporting, and equipment performance evaluation.

Chapter: Waived Testing
Program: Ambulatory Health Care Accreditation
Standard: WT.03.01.01

Standard Text: Staff and licensed independent practitioners performing waived tests are competent.

Element(s) of Performance:

5. Competency for waived testing is assessed using at least two of the following methods per person per test:
- Performance of a test on a blind specimen
- Periodic observation of routine work by the supervisor or qualified designee
- Monitoring of each user's quality control performance
- Use of a written test specific to the test assessed

Scoring Category : A
Score : Insufficient Compliance

Observation(s):

EP 5

Observed in HR File Review at Interventional Pain Center PLLC (27423 Van Dyke, Suite B, Warren, MI) site. In 7 of 7 HR files reviewed, it was noted that competency for waived testing is assessed using at least two methods per person per test was not documented in the personnel file.

Chapter: Waived Testing

Program: Ambulatory Health Care Accreditation

Standard: WT.05.01.01

Standard Text: The organization maintains records for waived testing.

Element(s) of Performance:

3. Quantitative test result reports in the clinical record for waived testing are accompanied by reference intervals (normal values) specific to the test method used and the population served.
Note 1: Semiquantitative results, such as urine macroscopic and urine dipsticks, are not required to comply with this element of performance.
Note 2: If the reference intervals (normal values) are not documented on the same page as and adjacent to the waived test result, they must be located elsewhere within the permanent clinical record. The result must have a notation directing the reader to the location of the reference intervals (normal values) in the clinical record.

Scoring Category : A
Score : Insufficient Compliance

Observation(s):

EP 3

Observed in Individual Tracer at Interventional Pain Center PLLC (27423 Van Dyke, Suite B, Warren, MI) site. It was noted that the reference intervals for the glucose and PT/INR results are not documented in the patient's chart.

Opportunities for Improvement – Summary

Observations noted within the Opportunities for Improvement (OFI) section of the report represent single instances of non-compliance noted under a C category Element of Performance. Although these observations do not require official follow up through the Evidence of Standards Compliance (ESC) process, they are included to provide your organization with a robust analysis of all instances of non-compliance noted during survey.

Program:	Ambulatory Health Care Accreditation Program	
Standards:	IC.02.02.01	EP1
	LD.04.02.01	EP6
	LS.03.01.10	EP9
	LS.03.01.34	EP6
	MM.03.01.01	EP2
	PC.03.01.03	EP16
	PC.03.01.07	EP9
	RC.02.01.01	EP2

The Joint Commission

Findings

Opportunities for Improvement – Detail

Chapter:	Infection Prevention and Control
Program:	Ambulatory Health Care Accreditation
Standard:	IC.02.02.01
Standard Text:	The organization reduces the risk of infections associated with medical equipment, devices, and supplies.

Element(s) of Performance:

1. The organization implements infection prevention and control activities when doing the following:
Cleaning and performing low-level disinfection of medical equipment, devices, and supplies. *
Note: Low-level disinfection is used for items such as stethoscopes and blood glucose meters. Additional cleaning and disinfecting is required for medical equipment, devices, and supplies used by patients who are isolated as part of implementing transmission-based precautions.
Footnote *: For further information regarding cleaning and performing low-level disinfection of medical equipment, devices, and supplies, refer to the website of the Centers for Disease Control and Prevention (CDC) at http://www.cdc.gov/hicpac/Disinfection_Sterilization/acknowledg.html.

Scoring Category : C
Score : Satisfactory Compliance

Observation(s):

EP1
Observed in Individual Tracer at Interventional Pain Center PLLC (27423 Van Dyke, Suite B,Warren,MI) site. It was noted that the medical assistant used a blood pressure cuff on a patient and replaced the cuff into the monitor basket without performing low-level disinfection.

Chapter:	Leadership
Program:	Ambulatory Health Care Accreditation
Standard:	LD.04.02.01
Standard Text:	The leaders address any conflict of interest involving licensed independent practitioners and/or staff that affects or has the potential to affect the safety or quality of care, treatment, or services.

Element(s) of Performance:

6. For ambulatory surgical centers that elect to use The Joint Commission deemed status option: The ambulatory surgical center discloses, where applicable, physician financial interests or ownership in the facility in accordance with 42 CFR Part 420. This disclosure information is in writing.

Scoring Category : C
Score : Satisfactory Compliance

Observation(s):

EP6
Observed in Individual Tracer at Interventional Pain Center PLLC (27423 Van Dyke, Suite B,Warren,MI) site. It was noted that the organization did not document disclosure of physician financial interest or ownership in the facility.

Chapter: Life Safety

Program: Ambulatory Health Care Accreditation

Standard: LS.03.01.10

Standard Text: Building and fire protection features are designed and maintained to minimize the effects of fire, smoke, and heat.
Note 1: This standard applies to sites of care where four or more patients at the same time are provided either anesthesia or outpatient services that render patients incapable of saving themselves in an emergency in the organization.
Note 2: This standard applies to all ambulatory surgical centers seeking accreditation for Medicare certification purposes, regardless of the number of patients rendered incapable.
Note 3: In leased facilities, the elements of performance of this standard apply only to the space in which the accredited organization is located; all exits from the space to the outside at grade level; and any Life Safety Code building systems that support the space (for example, fire alarm system, automatic sprinkler system).

Element(s) of Performance:

9. The space around pipes, conduits, bus ducts, cables/wires, air ducts, or pneumatic tubes that penetrate fire-rated walls and floors are filled with an approved fire-rated material.
Note: Polyurethane expanding foam is not an accepted fire-rated material for this purpose. (For full text and any exceptions, refer to NFPA 101-2000: 8.2.3.2.4.2)

Scoring Category : C
Score : Satisfactory Compliance

Observation(s):

EP9
Observed in Building Tour at Interventional Pain Center PLLC (27423 Van Dyke, Suite B,Warren,MI) site. There was a duct penetration located above the door at the entrance to procedure room 2.

Chapter: Life Safety

Program: Ambulatory Health Care Accreditation

Standard: LS.03.01.34

Standard Text: The organization provides and maintains fire alarm systems.
Note 1: This standard applies to sites of care where four or more patients at the same time are provided either anesthesia or outpatient services that render patients incapable of saving themselves in an emergency in the organization.
Note 2: This standard applies to all ambulatory surgical centers seeking accreditation for Medicare certification purposes, regardless of the number of patients rendered incapable.
Note 3: In leased facilities, the elements of performance of this standard apply only to the space in which the accredited organization is located; all exits from the space to the outside at grade level; and any Life Safety Code building systems that support the space (for example, fire alarm system, automatic sprinkler system).

Element(s) of Performance:

6. The organization meets all other Life Safety Code fire alarm requirements related to NFPA 101-2000: 20.3.4/21.3.4.

Scoring Category : C
Score : Satisfactory Compliance

Observation(s):

EP6
Observed in Building Tour at Interventional Pain Center PLLC (27423 Van Dyke, Suite B,Warren,MI) site. The main fire alarm control panel cabinet was not labeled with the circuit breaker that controlled power to the panel.

Chapter: Medication Management

Program: Ambulatory Health Care Accreditation

Standard: MM.03.01.01

Standard Text: The organization safely stores medications.

The Joint Commission

Findings

Element(s) of Performance:

2. The organization stores medications according to the manufacturers' recommendations.
Note: This element of performance is also applicable to sample medications.

Scoring Category : C
Score : Satisfactory Compliance

Observation(s):

EP2
Observed in Individual Tracer at Interventional Pain Center PLLC (27423 Van Dyke, Suite B,Warren,MI) site. It was noted that the refrigerator temperature monitoring was not documented when the organization was open and closed.

Chapter: Provision of Care, Treatment, and Services

Program: Ambulatory Health Care Accreditation

Standard: PC.03.01.03

Standard Text: The organization provides the patient with care before initiating operative or other high-risk procedures, including those that require the administration of moderate or deep sedation or anesthesia.

Element(s) of Performance:

16. For ambulatory surgical centers that elect to use The Joint Commission deemed status option: A physician or other qualified practitioner, in accordance with applicable state health and safety laws, standards of practice, and organization policy, examines the patient immediately before surgery to evaluate patient risk for the procedure to be performed.

Scoring Category : C
Score : Satisfactory Compliance

Observation(s):

EP16
Observed in Individual Tracer at Interventional Pain Center PLLC (27423 Van Dyke, Suite B,Warren,MI) site. It was noted that the physician performing the procedure did not examine the patient before the procedure.

Chapter: Provision of Care, Treatment, and Services

Program: Ambulatory Health Care Accreditation

Standard: PC.03.01.07

Standard Text: The organization provides care to the patient after operative or other high-risk procedures and/or the administration of moderate or deep sedation or anesthesia.

Element(s) of Performance:

9. For ambulatory surgical centers that elect to use The Joint Commission deemed status option: The ambulatory surgical center completes the appropriate postsurgical assessments for each patient, including all elements required for discharge.

Scoring Category : C
Score : Satisfactory Compliance

Observation(s):

EP9
Observed in Individual Tracer at Interventional Pain Center PLLC (27423 Van Dyke, Suite B,Warren,MI) site. The physician who performed the procedure did not write a discharge order and the nurse did not complete the discharge process including the medication reconciliation process.

Chapter: Record of Care, Treatment, and Services

Program: Ambulatory Health Care Accreditation

Standard: RC.02.01.01

Standard Text: The clinical record contains information that reflects the patient's care, treatment, or services.

Element(s) of Performance:

2. The clinical record contains the following clinical information:
- The patient's initial diagnosis, diagnostic impression(s), or condition(s)
- Any findings of assessments and reassessments (See also PC.01.02.01, EPs 1 and 4; PC.03.01.03, EPs 1 and 8)
- Any allergies to food
- Any allergies to medications
- Any conclusions or impressions drawn from the patient's medical history and physical examination
- Any diagnoses or conditions established during the patient's course of care, treatment, or services
- Any consultation reports
- Any progress notes
- Any medications ordered or prescribed
- Any medications administered, including the strength, dose, and route
- Any access site for medication, administration devices used, and rate of administration
- The patient's response to any medication administered
- Any adverse drug reactions
- Plans for care and any revisions to the plan for care (See also PC.01.03.01, EP 1)
- Orders for diagnostic and therapeutic tests and procedures and their results

Scoring Category : C
Score : Satisfactory Compliance

Observation(s):

EP2
Observed in Document Review at Interventional Pain Center PLLC (27423 Van Dyke, Suite B,Warren,MI) site. It was noted that the patient chart has no mechanism for the physician to order the waived testing.

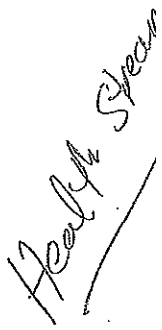

EXHIBIT E

Monthly Patient Monitoring Equipment
Procedure Room Monitor
Cleaning Log For Fluoro 1

Month May, 2017

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	Comments
Monitoring Unit																																
Clean, no spills, clear of objects	X	X	X	X	X	X		X	X	X	X	X	X		X	X	X	X	X	X		X	X	X	X	X	X		X	X	X	
Display functional	X	X	X	X	X	X		X	X	X	X	X	X		X	X	X	X	X	X		X	X	X	X	X	X		X	X	X	
ECG leads attached to unit	X	X	X	X	X	X		X	X	X	X	X	X		X	X	X	X	X	X		X	X	X	X	X	X		X	X	X	
Cables-no cracks, broken wires, or damage	X	X	X	X	X	X		X	X	X	X	X	X		X	X	X	X	X	X		X	X	X	X	X	X		X	X	X	
Blood pressure cuff ok	X	X	X	X	X	X		X	X	X	X	X	X		X	X	X	X	X	X		X	X	X	X	X	X		X	X	X	
Pulse Ox																																
Operational	X	X	X	X	X	X		X	X	X	X	X	X		X	X	X	X	X	X		X	X	X	X	X	X		X	X	X	
Fluroscope Power Supply																																
Operational	X	X	X	X	X	X		X	X	X	X	X	X		X	X	X	X	X	X		X	X	X	X	X	X		X	X	X	
Cleaning - staff will check off and initial as completed. N=nightly, W= weekly, M=monthly, Q=quarterly																																
Type of Cleaning Complete	N	N	N	N	N	N		N	N	N	N	N	N		N	N	N	N	N	N		N	N	N	N	N	N		N	N	N	
Initials	Deni	→						→							→							→							→			

Refrigerator Temperature Log

Date	Time	Recorded By	Internal Temp	Range	Clear Memory	Corrective Actions
5-17	11:00	Deni	40°F	37-44	✓	
5-18	11:30		40°F	38-44	✓	
5-19	11:30		40°F	40-44	✓	
5-20	11:30		40°F	40-44	✓	
5-22	10:00		40°F	40-44	✓	
5-23	10:00		40°F	40-44	✓	
5-24	10:00		40°F	40-44	✓	
5-25	11:00		40°F	39-44	✓	
5-26	11:30		40°F	39-44	✓	
5-27	11:30		40°F	39-44	✓	
5-29	11:30		40°F	39-44	✓	
5-30	11:30		40°F	39-44	✓	
5-31	11:30		40°F	39-44	✓	
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Refrigerator Temperature Log

Date	Time	Recorded By	Internal Temp	Range	Clear Memory	Corrective Actions
4-22	11:00	Dm	40°F	37-44	✓	
4-24	10:00		40°F	37-44	✓	
4-25	10:00		40°F	37-44	✓	
4-26	10:00		40°F	37-44	✓	
4-27	10:30		40°F	37-44	✓	
4-28	10:30		40°F	37-44	✓	
4-29	10:30		40°F	37-44	✓	
5-1	10:00		40°F	37-44	✓	
5-2	10:00		40°F	37-44	✓	
5-3	10:00		40°F	37-44	✓	
5-4	10:00			37-44	✓	
5-5	10:00			37-44	✓	
5-6	11:00			37-44	✓	
5-8	11:30			37-44	✓	
5-9	10:00			37-44	✓	
5-10	10:00			37-44	✓	
5-11	10:00			37-44	✓	
5-12	10:00			37-44	✓	
5-13	11:00			37-44	✓	
5-15	11:00			37-44	✓	
5-16	11:00			37-44	✓	